

# Part C Annual Performance Report

July 1, 2008 to June 30, 2009

**Submitted by** 

Louisiana
Department of Health & Hospitals
Office for Citizens with Developmental Disabilities

**February 1, 2010** 

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## **Louisiana Part C Annual Performance Report**

## and State Performance Plan (Indicator 3)- FFY 2008

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#### Part C State Annual Performance Report (APR) for FFY 2008-2009

#### **Administrative History**

In 2003, Louisiana's Part C Program, EarlySteps, was moved from the Department of Education as lead agency to the Department of Health and Hospitals, Office of Public Health. During this administration of the program, significant changes were made including a revised, broad eligibility criteria, a renewed focus on services in natural environments, redesigning the system point of entry process, and the enrollment of independent service providers. These changes resulted in an increase in the number of children identified and served, an increase in the availability of providers and an increase of children receiving services in natural environments since 2004-2005.

In May, 2006, more rigorous eligibility criteria were adopted, placing EarlySteps with other states with narrow eligibility criteria category. This change, as well as the effects of Hurricanes Katrina and Rita, resulted in a drop in the numbers of children served from 4522 to 3405 in 2005-2006 and to 2325 in 2006-2007.

During fiscal year 2005-2006, EarlySteps implemented a 25% cut in the rate for provider reimbursement for services following state agency budget cuts following the hurricanes. This resulted in providers leaving the program and a decrease in providers available for service delivery, a trend which continues to impact the system to date. The cut to reimbursement and the decrease in provider availability have negatively impacted timely service delivery (indicator 1).

Effective July 1, 2007, the administration of EarlySteps moved from the Office of Public Health to the Office for Citizens with Developmental Disabilities (OCDD) still within the Department of Health and Hospitals. Only one central office employee made the transition to OCDD, none of the quality assurance specialists remained in this capacity and two of the nine regional coordinators chose to leave the program. There were four vacancies (out of nine) for the EarlySteps parent liaisons. These are parents of children with disabilities who work with families in the EarlySteps System under the job title of Community Outreach Specialist (COS).

With these staff shortages, limited on-site monitoring activities were conducted. Quality improvement activities were conducted largely through data system reviews, self-assessment, focused monitoring for APR Indicator reporting, and follow up by regional coordinators of agency corrective action plans.

#### **Program Transition Update and Contributions to Reporting and Data Results**

As part of the program transition, OCDD arranged for a program evaluation of EarlySteps by Charles Gifford, PhD, with the University of New Orleans, beginning in April, 2007. The evaluation included review of documents and the analysis and synthesis of written and oral comments from over 100 stakeholders in the state. Stakeholders included parents, SICC and its committee members, individual providers and agencies involved in service delivery. Results of the evaluation indicated need for recommended program improvement activities in six areas: public relations and communication, fiscal management, data management, administrative organization, training, program compliance, policies and procedures, and in the relationship of EarlySteps with the State Interagency Coordinating Council and Regional Interagency Coordinating Councils (RICC's). Based on the evaluation results, a one-year implementation plan was developed for FFY 2007 and formed the basis for additional improvement activities being conducted in 2007-2008 as outlined in the indicator sections which follow. Nearing the end of the 2007-2008 Action Plan period, the lead agency participated with the Louisiana Interagency Coordinating Council in its development of a strategic plan. The process facilitated the evaluation of the 2007-2008 action plan and the development of subsequent plans for 2008-2009 and 2009-2010 including revised improvement activities.

A major component for the implementation of this action plan involved development of an organizational structure for EarlySteps. The following central office structure is in place: Program Manager, Assistant Program Manager, Quality Assurance Specialist Coordinator, Training Coordinator and Provider

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Relations Specialist. EarlySteps central office staff is supervised by the OCDD Deputy Assistant Secretary and Executive Director for Community Services. Nine Regional Coordinators are housed in OCDD regional offices and human services districts/authorities. In the past, monitoring and quality assurance activities for the state were the responsibility of three QAS staff. The revised structure includes nine regional QAS staff with one-third time assigned to EarlySteps and two-thirds time responsibility for other OCDD programs. Currently, seven of the nine positions are filled. In addition, through contracts with agencies such as Families Helping Families and Southeast AHEC, EarlySteps has contracts to provide family support activities with 9 Community Outreach Specialists, whose activities are coordinated by the state Parent Liaison. As of January, 2010, all nine COS positions are staffed.

To address concerns regarding the decrease in the number of eligible children in the program during 2005-2006, the eligibility criteria was revised effective July, 2007 to a less rigorous definition of developmental delay to 1.5 standard deviations in one area of development or in one sub-area: receptive or expressive language or fine or gross motor. The definition of informed clinical opinion was revised. The established medical conditions were expanded. This moves Louisiana from a narrow to moderate classification of its eligibility criteria. The result has had an immediate impact in child count as seen in the December 1, 2007 child count of 3155, an increase from 2325 in the December 1, 2006 child count. Child count has continued to increase with the December 1, 2009 child count at 4548 children.

Since July 2007, additional staff have been added to the program and general supervision activities have increased and include: focused monitoring for APR data, focused monitoring when triggered by data reports and in response to complaints, and chart review for provider monitoring. The Quality Assurance Coordinator (QAC) was hired in February, 2009. He is responsible for coordinating the General Supervision system statewide. Beginning in January, 2009, Louisiana began a technical assistance project on its general supervision system using the resources of the Southeast Regional Resource Center (SERC) and the Data Accountability Center (DAC). The QAC is responsible for coordinating project activities. The goals for the project are to:

- improve data quality,
- to develop a comprehensive quality enhancement process that aligns the components utilized by OCDD as well as the general supervision requirements of IDEA, Part C,
- to standardized the components of the system across all regional/district/authority offices and central office,
- to enhance the system with additional standards that address program quality.

With the participation of central and regional office staff, COS's, SICC and other stakeholder input, Louisiana has drafted quality performance indicators, designed a measurement system to monitor these indicators and to developed an annual calendar to include all general supervision activities. Once complete, Louisiana's general supervision system will be one that not only measures compliance with required components but also quality of services. To date, the task force has drafted 14 supplemental performance indicators, the measures for each and the source for collection. This activity constitutes Phase One of the project and additional indicators are being considered. The work group will continue in 2010.

Louisiana is also participating in a technical assistance project regarding transition, jointly with the Louisiana Department of Education (LDE), with SERRC and NECTAC. The purpose of the project is to improve results for Part C Transition Indicator 8 and Part B Indicator 12. In addition to its data-sharing for Indicator 8(b), EarlySteps central office and regional office staff began meeting with LDE central and regional office preschool staff and local education agencies in their bi-annual meetings in 2007. Using these meetings, SERRC and NECTAC facilitated regional needs assessments and a process for regions to develop plans to address their needs. Regional meetings are ongoing since the first project meeting in May, 2009. More information about the project and its results is included in the discussion section in Indicator 8.

For this FFY 2008 SPP progress report for Indicator 3, Louisiana will be reporting data on child outcomes using the *Battelle Developmental Inventory* 2<sup>nd</sup> edition for the second year. As part of the transition to OCDD, the state began using this one tool statewide for entry (as part of eligibility determination) and for exit data for reporting child outcomes effective July 1, 2007. Louisiana is reporting assessment data for

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all children who were assessed with the BDI2 at entry and exit who had been in the program for at least 6 months. In addition, Louisiana is submitting baseline data and targets.

In October, 2009, Louisiana participated in a verification visit with OSEP and is awaiting its verification visit letter. Technical assistance provided by OSEP Staff at the visit has assisted the EarlySteps staff in developing improvement strategies for the General Supervision System.

#### **Overview of the Annual Performance Report Development:**

The Louisiana State Performance Plan and Annual Performance Report were developed with broad stakeholder input. Since the passage of the legislation for the early intervention system, the development of the Part C program components has been conducted through stakeholder input and the committee recommendations of the State Interagency Coordinating Council (SICC). These families, stakeholders and SICC members were also involved in the development of the State Performance Plan in 2005 and the Annual Performance reports for FFY 2005, 2006, 2007, and 2008. Committees were formed which included these members, providers, EarlySteps central office staff, regional coordinators, regional quality assurance specialists, and regional EarlySteps Parent Liaisons for the development of the SPP and APR. In addition, central office and regional staff participated in technical assistance telephone conference calls provided by the U. S. Department of Education, Office of Special Education Programs (OSEP) and by SERRC and NECTAC. The Part C coordinator and other program staff attended the December 2007, 2008, and 2009 OSEP conferences. The current Part C coordinator also attended the Outcomes Conference in August, 2007 and the assistant program coordinator attended the August, 2008 Leadership Conference and Outcomes Conference. The EarlySteps data manager attended the Data Managers meeting in 2008. The Quality Assurance Coordinator attended the Data Managers and Outcomes meetings in 2009. SERRC provided a TA meeting in October, 2008 which was attended by the Part C coordinator.

Data for reporting performance was collected through the following procedures:

- Desk audits of central data system reports (Early Intervention Data System-EIDS)
- Monitoring by Regional Coordinators and central office staff which included onsite visits and records review
- Self-assessments conducted by SPOE agencies
- Technical Assistance and on-site follow up monitoring by Regional Coordinators
- Family surveys collected by Community Outreach Specialists (Parent Liaisons) and through the OCDD contractor

The requested information from the OSEP analysis of the FFY 2007 APR outlined in the APR Response Table from June, 2009 is included within the discussion section of each indicator as appropriate. The technical assistance (TA) resources used by Louisiana and the subsequent actions take resulting from the TA are also included in each indicator section. With its June, 2009 determination of Needs Assistance, the state was required to submit a report to OSEP on October 1, 2009 on how the technical assistance selected by the State is addressing the factors contributing to ongoing noncompliance. The report was submitted to OSEP and detailed partial correction of noncompliance as of that date. Udpated information is provided in each indicator section regarding the status of the remaining findings of noncompliance from FFY 2005 and 2006 as well as 6 uncorrected findings from FFY 2007.

#### Part C State Annual Performance Report (APR) for FFY 2008-2009

#### Overview of the Annual Performance Report Development - Indicator 1

Activities for development included:

- Stakeholders of the SICC service delivery committee provided recommendations for the definition of timely services as: any Early Intervention Services identified on the initial and subsequent IFSP's which are initiated within 30 days of obtaining parent consent.
- Early Intervention Data System (EIDS) report was developed to analyze timely services according
  to the following definition: identification of timely services provided within 30 days of the
  development of an IFSP for all children with initial, revised, or annual IFSP's between July 1 and
  September 30, 2008. This timeline is representative of all quarters of the reporting period and
  represents census data.

#### Monitoring Priority: Early Intervention Services In Natural Environments

**Indicator 1:** Percent of infants and toddlers with IFSPs who receive the early intervention services on their IFSPs in a timely manner.

(20 U.S.C. 1416(a) (3) (A) and 1442)

#### Measurement:

Percent = [(# of infants and toddlers with IFSP's who receive the early intervention services on their IFSP's in a timely manner) divided by the (total # of infants and toddlers with IFSP's)] times 100. Account for untimely receipt of services, including the reasons for delays.

FFY	Measurable and Rigorous Target
2008-2009	100% of infants and toddlers with IFSP's will receive the early intervention services on their IFSP's in a timely manner.

#### **Data Source and Measurement Considerations**

Timely services are defined by Louisiana as delivery of any early intervention services identified on the initial IFSP and any additional early intervention services identified on subsequent IFSP's that are provided within 30 days from parent consent for IFSP services.

# Target and Actual Data for FFY 2007: 87.6% of infants and toddlers with IFSP's received the early intervention on their IFSP's in a timely manner.

	2004-2005 Baseline	2005-2006	2006-2007	2007-2008	2008-2009
Target	100%	100%	100%	100%	100%
Actual	75.55%	50%	85%	86%	87.6%
Raw Data		116 meet	195 meet	144 meet	355 meet
		<u>timeline</u>	<u>timeline</u>	<u>timeline</u>	<u>timeline</u>
		234 reviewed	229 reviewed	167 reviewed	405 reviewed

Discussion of Improvement Activities Completed <u>and</u> Explanation of Progress that occurred for 2008-2009

#### **Data Collection Discussion**

Louisiana did not meet its target of 100% for this indicator. However, the state improved toward meeting its target from 86% of children receiving timely services in 2007-2008 to 87.6% for 2008-Data collected for this indicator is accurate and valid as it was collected from all nine regions of the state in all 21 family support coordination (FSC) agencies. The planned process of data collection for this fiscal year was to develop an EIDS report comparing IFSP dates for the July-September, 2008 date range with service dates within 30 days. The report queried IFSP dates within the date range to identify IFSP's written, by child and by FSC agency and included service authorization dates and service date ranges from 7/1/2008 through 12/31/2008. Analysis of the report revealed that 50 children did not receive services within the 30 days and resulted in 16 findings by FSC agencies. One of the report fields provided with the EIDS report gives the service date following the IFSP date. Therefore, the start date of the service, although late, can be verified to establish that services have been initiated for each child reviewed. In every case, the service that was not provided timely had a service date no later than 12/31/2008. Prior to issuing findings, regional staff conducted child-specific chart review to verify that the EIDS report is yielding valid data for reporting for this indicator. In provider monitoring conducted during 2008-2009 findings related to undocumented services or other problems with IFSP services are issued findings under Indicator 1 Related Requirements. There were 25 findings issued to providers for this cycle of monitoring and 5 findings from complaints.

#### **Improvement Activities Discussion**

EarlySteps regional coordinators are responsible for providing technical assistance to the systems points of entry agencies, family support coordination agencies and providers regarding this indicator. Improvement activities include periodic data reviews from the data system and chart reviews which trigger technical assistance and training. Cyclical monitoring activities by new QAS and central office staff were scheduled to begin in Spring, 2008. Due to a hiring freeze at that time, most of the QAS's were hired in Summer and Fall, 2008. In addition, the Lead Agency and SICC are addressing, at the state level, the primary causes for ongoing noncompliance for timely services: reimbursement rates and provider availability throughout the state. A rate increase was approved by an appropriation from the legislature during the 2008 session and implemented on September 1, 2008. The Centers for Medicare and Medicaid Services Agency (CMS) has not approved the increased rate for family service coordination paid by Medicaid as of December, 2009, although the increased reimbursement is in effect for service coordination paid for out of state general funds and Part C funds. As a result of the delay, agencies have delayed hiring additional FSC staff, which has directly impacted timely service delivery. FSC's continue to carry high caseloads and ongoing service coordinators may be selected late. In this case, the SPOE intake coordinator is forced to continue in that role beyond the development of the initial IFSP. Upon approval by CMS the increase will be retroactive to 9/1/2008 and will assist agencies in hiring new staff. The rate increase for other services was immediately implemented and combined with enrollment efforts of the regional coordinators, provider availability has improved in this fiscal year. In addition, providers who are OCDD employees at the Statesupported Supports and Services Centers have enrolled in EarlySteps adding over 100 additional providers to the system statewide. As state employees, their service delivery time is not totally dependent on EarlySteps reimbursement making them more available in the rural and underserved areas where provider shortages remain. The regional coordinators have also been monitoring timely services through chart reviews at FSC agencies. An average of 29 charts was reviewed per month during the reporting period. As a means of addressing performance in this indicator, Louisiana, as in many other states, will continue its efforts in provider recruitment and training to address timely services. In addition, EarlySteps is emphasizing the use of team-based service delivery, so that teams of providers can better support family and child needs. For this reporting period, the state did not track delays in timely service delivery that are attributable to family circumstances.

#### Technical Assistance resources used:

- Part C SPP/APR 2008 Indicator Analyses (FFY 2007-2008): for ideas for improvement strategies. SERRC Improvement Activities by Indicator for Part C improvement strategies used.
- Sessions from National Accountability Conference: use of state employees for coverage of rural and shortage areas so that total service delivery cost is not rate dependent. OCDD Support & Services Center Staff who are state-employees have enrolled and are providing services in rural areas where provider availability is limited.
- Recommendations from Louisiana ICC Program Services Committee regarding use of "Team-based" service delivery within current service system structure and program support for an agency-based teaming, primary provider service delivery model in Region 2. In addition, a web-based module and face-to-face training on teaming are underway statewide in 2009-2010.
- Participation in a data quality technical assistance project with SERRC and DAC. Through
  this project, the state identified faulty timeline processes which allowed noncorrection to
  continue beyond the one-year timeline. Through development of more timely responses
  when findings are made, the state is now better able to correct findings for this Indicator
  within one year.
- Resources from the RRFC Network Website were reviewed and the following have been incorporated as activities the state will use to address noncompliance: Guidance and Suggestions for SPP/APR Indicator C1(12/3/2008)
  - Consider using exceptional family circumstances in calculation to reduce opportunities for this as a contributing factor, including different types of family reasons (page 3).
- Consider reporting percentages of delay or systemic reasons for untimely services (page 4)
- The State will continue to refine the EIDS data report, used to collect data for this indicator, to include exceptional family circumstances in the calculation and report.

The improvement strategies chart at the end of the discussion for Indicator 1 identifies State Performance Plan 2005-2010 improvement activities, timelines and resources as well as revisions with justification based on FFY 2008 performance.

#### **Correction of Noncompliance Discussion**

A major ongoing concern for EarlySteps for this indicator, beyond not meeting its target, has been correction of ongoing noncompliance from previous fiscal years. Through participation in the Data Quality TA project, the consultants assisted Louisiana in identifying the cause for the problem as a faulty timeline for identification and follow up of noncompliance which did not allow for correction within one year. As a result, the State used its review procedures (chart review and EIDS) to verify performance and was able to correct of all findings from FFY 2005 and 2006 and all but one finding from FFY 2007. The chart below provides the current correction status:

Indicator 1	FFY 2005	FFY 2006	FFY 2007	FFY 2008
Findings	17	7	11	46
Number Corrected	8	4	2	27
Status of remaining findings	4 corrected, 5 remaining uncorrected	3 corrected from FFY 05 3 remaining from FFY 06	-2 corrected from FFY 05 -3 corrected from FFY 06 -10 corrected from FFY 07	1 remaining from FFY 07 19 remaining from FFY 2008

#### Additional Indicator 1 data request/clarification from FFY 2007 APR Response Table

"The State must demonstrate, in the FFY 2008 APR, due February 1, 2010, that the remaining two FFY 2005 and three FFY 2006 findings were corrected.

As indicated in the chart above, the findings from FFY 05 and 06 were corrected. The regional coordinators conducted chart reviews and met regularly with agencies to verify that services were initiated for each child, although late, for whom services were not timely. Correction was verified through onsite chart review.

"The State must report. . .that it has verified that each EIS program with noncompliance reported by the State under this indicator in the FFY 2007 APR: (1) is correctly implementing the specific regulatory requirements; and (2) has initiated services for each child, although late. . ."

As indicated above, through its data system reports and chart review, staff are able to verify that, although late, services were initiated for each child for whom noncompliance was identified and that the regulatory requirements are being implemented in each agency.

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Revisions, <u>with Justification</u>, to Proposed Targets / Improvement Activities / Timelines / Resources for 2008-2009. Unless otherwise indicated, most improvement activities approved for the State Performance Plan are ongoing.

Updated timelines and activities are provided below. One additional improvement activity is planned for 2009-2010. Many are underway and performance improvement has continued. No revisions to activities are planned.

Improvement Activities –Indicator 1	Timelines/	Discussion/Progress/Slippage
	Resources	
Provide ongoing training and technical assistance to provide supports for providers and service coordinators	Fall 2005 and ongoing through 2011	Each eligible child and the child's family are provided with a service coordinator who is responsible for coordinating all services and acting as a single point of contact in helping parents obtain
Coordinators	QAS staff	services.
	Regional Coordinators	The service coordinator is responsible for the implementation of the IFSP, which identifies all services in detail per the requirements of the law. Service coordinators are aware that one of their primary responsibilities is to ensure that the child receives services in a timely manner.  QAS are in place in all regions but 2, and are conducting monitoring activities. Training and technical assistance are provided on an ongoing basis and in response to findings of noncompliance by the regional coordinators throughout the State.
		The Practice Manual identifies responsibilities for timely services by service coordinators and providers.
Data Quality TA project beginning February, 2009 with DAC and SERRC.	February, 2009 and ongoing  QAS staff,	The project, as described in the APR introduction is ongoing. Improvements from this project have resulted in more effective and timely correction of findings as well as correction of findings from previous fiscal years.
	Regional Coordinators, Central Office staff, statewide Parent Liaison, COS's	
Develop guidance materials and technical assistance for service coordinators and early intervention providers on the importance of "timely" services	Summer 2006 and ongoing /EarlySteps training coordinator	Upon identification of significant non-compliance in this area, the regional coordinators provided intensive technical assistance on this requirement. The State will develop additional guidance materials to emphasize the importance of timely services.

Improvement Activities –Indicator 1 Timelines/ Discussion/Progress/Slippage		
improvement Activities –indicator i		Discussion/Progress/Suppage
	Resources	
Develop and disseminate training materials to address best practices of service delivery	Ongoing through 2011/EarlySteps Training Coordinator	A document was developed by a committee of the SICC entitled "Best Practice Guidelines". This document has been in use since the fall of 2005. This document recommends evidence based best practice in helping a team determine the amount of service required for a child.
The EarlySteps practice manual is being revised beginning Winter, 2007 and will incorporate the best practices document.		The final draft of the practice manual is targeted for completion by February 2010. The service determination guidance is under revision and will be included in the revision. Training on its use will begin in Spring, 2010.
Continue to facilitate enrollment of new service providers to increase availability to access to services.	Ongoing through 2011	The Regional Coordinator meets with each potential provider as part of the enrollment process to review service guidelines, practices, requirements, etc. An average of 29 contacts per month were held with potential providers in FFY 2008. An increase of at least 300 providers in 12 months resulted.
OCDD is pursuing re-establishment of reimbursement rates (cut 25% in 2006) to increase provider capacity across the state.	9/1/2008 and ongoing	The rate increase became effective 9/1/2008 and an additional 300 providers were enrolled in 2008-2009 in a variety of disciplines and geographic areas of the state.
Consider incentives such as travel, and/or increased rates to attract providers to rural and underserved areas.		An additional rate increase was requested in the 2009 Legislative session but was not approved due to budget constraints.
Review and consider rate structure proposal from SICC System Resources Committee.		
Continue to work with the Bureau of Health Services Financing (Medicaid) to refine the provider billing process.		
Ensure monitoring of provider enrollment for qualified providers	Ongoing through 2011	Regional coordinators continue to recruit new providers.
Since transition of EarlySteps to OCDD, the Interagency Agreements with Medicaid and the SICC are completed and the agreement with the Louisiana Departments of Education and Social	July 2007 and ongoing	Agreements with Medicaid, SICC, Education, Head Start/Early Head Start are in place.

Improvement Activities –Indicator 1	Timelines/ Resources	Discussion/Progress/Slippage
Services (Office of Community Support, Child Care, Head Start, Early Head Start) will be finalized by June, 2008.		
Develop CSPD University Consortium to embed EarlySteps practices into pre-service training and increase participation from additional university and colleges	Spring 2008 and ongoing through 2011	To increase awareness of early intervention as a potential career, copies of the 3 EarlySteps Training Modules were distributed to 21 university training programs who had expressed interest in receiving them. These represented several disciplines. It is hoped that the materials are incorporated into their curricula.  The EarlySteps training coordinator worked with the SICC CSPD committee in the development of a new CSPD Plan as part of the implementation of the SICC Strategic Plan. The plan was completed and approved by the SICC in November, 2009
In conjunction with the transition of EarlySteps to OCDD, the SICC committees, including CSPD have been reestablished. A training contract with the CSPD consortium ends December, 2007. Opportunities for ongoing training and maintenance of current efforts will be developed beginning Spring, 2008.		The approval for the training contract for 2008-2009 was delayed. Activities began in January, 2009 and 4 additional modules were developed: <i>IFSP</i> , <i>Family-Centered Services</i> , <i>BDI-2</i> and <i>Teaming</i> . A new training contract was issued beginning in July 2009. A training calendar is posted for 2009-2010.  ICC committees assisted central office staff to revise and update the original 3 training modules from the earlier contract.
Develop guidance materials and technical assistance for a system of cost participation by families.	Spring 2007	State Office, CFO, System Resources Committee Initial guidance materials were developed and technical assistance was provided. However the State has made a decision to postpone the implementation of family cost participation. Guidance materials will be developed as needed.  Status: postponed
Develop additional guidance materials on the	Spring 2007 and	State Office, Service Delivery Committee

Improvement Activities –Indicator 1	Timelines/	Discussion/Progress/Slippage
	Resources	
provision of timely services.	ongoing through 2011	
Improve data collection system to include tracking timely service delivery within 30 days, consider	June, 2008	An EIDS report was successfully generated for data collection for
adding delays due to family circumstance	EIDS, Central Data System	this indicator. The report will be revised to add family circumstances for 2009-2010.
Beginning, January, 2008, revise the service provider contact note to include addition of "1st service date," with justification if provided more than 30 days from IFSP date and require submission of the contact note to FSC agency to simplify data collection for timely services.	January, 2008 and ongoing	This change was added to the provider contact notes and will be used to verify correction or as a means to trigger technical assistance following chart review.
Explore, through pilot activities, models for teaming and/or transdisciplinary service delivery to enhance service provider ability to meet child/family needs	September, 2008 and ongoing	Use of transdisciplinary teams enhances provider skills across traditional disciplines. The revised practice manual now contains recommendations from the SICC to enhance teaming strategies within current service delivery structure. In addition, an online module is available on teaming and regional face-to-face training activities on teaming are planned for 2009-2010
Consider adding question to Family Survey regarding timeliness of services	January, 2010-June 2010	Obtain feedback from families regarding issues/problems/successes in timely service delivery.
Train, enroll and offer ongoing support to service providers in the OCDD supports and services centers.	Spring, 2009 and ongoing	OCDD has 7 regional Supports and Services Centers throughout the state providing residential options and services to adults with disabilities. Providers from the centers will be trained and enrolled to become EarlySteps providers.
		Approximately 110 providers were enrolled from all the centers through June, 2009. New providers represent many needed disciplines for service delivery and these providers are available to provide services in rural and underserved areas.
Develop and implement communication strategies with SPOE's and FSC agencies to identify effective practices and challenges in meeting 30-day timeline	Summer, 2009 and ongoing	SPOES and FSC agencies with effective strategies in achieving 100% compliance will be asked to share policies and procedures with those SPOES and FSC agencies who have had ongoing

Improvement Activities –Indicator 1	Timelines/ Resources	Discussion/Progress/Slippage
		findings.
Report quarterly performance on compliance indicators, including Indicator 1 at RICC meetings	Fall, 2009 and ongoing	Identify trends for disciplines, providers, etc where timeliness is successful or not.
Include, in staff monthly reporting requirements, reports of services by discipline provided in < 30 days and those > 30days	Spring 2010 and ongoing	Provide stakeholders in the regions with a direct opportunity for "ownership" of the requirement.
New Strategy for 2009-2010 Improve process to coordinate correction of noncompliance with issuing annual	Spring 2010 and ongoing	The timelines for issuing determinations have not been consistent, resulting in confusion with findings and correction for provider
determinations consistently	QAC	agencies.
	Program Manager	
	Data Quality TA Consultants	

#### Part C State Annual Performance Report (APR) for FFY 2008-2009

#### Overview of the Annual Performance Report Development - Indicator 2:

Development of activities for Indicator 2 was accomplished through:

- Desk reviews of EIDS data reports
- Technical assistance to family support coordinators and providers to address natural environment options when limitations in provider availability occur.

#### Monitoring Priority: Early Intervention Services In Natural Environments

**Indicator 2:** Percent of infants and toddlers with IFSPs who primarily receive early intervention services in the home or programs for typically developing children.

(20 U.S.C. 1416(a) (3) (A) and 1442)

**Measurement:** Percent = [(# of infants and toddlers with IFSPs who primarily receive early intervention services in the home or community-based settings) divided by the (total # of infants and toddlers with IFSPs)] times 100.

FFY	Measurable and Rigorous Target
2008-2009	98% of Louisiana's infants and toddlers with IFSP's primarily receive early intervention services in the home or community-based settings.

#### **Data Source and Measurement Considerations**

The EIDS is used to collect data for this indicator. Service settings are determined as part of the IFSP process and entered by the system points of entry into the system. Reports can be generated from EIDS for compliance monitoring.

**Actual Target Data for FFY 2008-2009:** 99% of Louisiana's infants and toddlers with IFSP's primarily received early intervention services in the home or in community-based settings. Louisiana has continued to meet its target for Indicator 2.

	2004-2005 Baseline	2005-2006	2006-2007	2008-2009	2008-2009
Target	96.74%	97%	98%	98%	98%
Actual		98.6%	99%	99%	99%
Raw Data=	4373	3406	<u>2313</u>	<u>3140</u>	<u>3781</u>
Services in	4522	3450	2335	3155	3788
natural env.					
Total served					

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Discussion of Improvement Activities Completed <u>and</u> Explanation of Progress that occurred for FFY 2008-2009 and revisions, <u>with</u> <u>Justification</u>, to Proposed Targets / Improvement Activities / Timelines / Resources for 2008-2009

When the Department of Health and Hospitals became the lead agency for EarlySteps in 2003, a priority was established to improve service delivery in natural environments through the development of a new system point of entry process, through the recruitment and enrollment of individual service providers to increase provider capacity, and through development of a tiered reimbursement rate with the highest level of reimbursement, in the natural environment. These activities have contributed to Louisiana's continued success in meeting its target for this indicator. No additional improvement activities are proposed. Some implementation timelines have been updated as shown below.

Improvement Activities- Indicator 2	Timelines	Discussion/Progress/Slippage for 2008-2009
Develop Best Practices Guidelines on service delivery. The practice manual is currently being revised and will integrate these and other recommended guidelines throughout the document.	Fall 2005- Summer 2010	Revisions to the practice manual were presented to the ICC committees in 2009. Comments were received by the workgroup and additional revisions finalized with a February, 2010 timeline. The guidelines have been integrated in the appropriate sections throughout the document. Training on the revisions to the manual and posting to the website will follow.
Three training modules were developed and made available in Fall, 2007. Three additional modules will be developed in 2009. These six modules will form the core program content for staff, agencies, providers, families, etc.	2007 and ongoing	Contracts for development of the next 3 training modules and hosting of the 3 current Web based modules were approved to begin in January, 2009 and July 2009 respectively. Three additional modules have been completed and are being prepared to be posted on-line: <i>Teaming, Family-Centered Services</i> , and <i>IFSP</i> . The Teaming module also includes a face-to-face component.
Provide ongoing training and technical assistance to provide supports for providers and service coordinators on Best Practice regarding natural environments  Incorporate the 3 modules developed in Fall, 2007, into the provider enrollment process to establish a core knowledge base with all new providers. A timeline for completion of the modules has been established by the lead agency.	Spring 2006 and ongoing through 2011	The IFSP contains a section to address justification for services provided outside the natural environment setting.  TA is provided to FSCs by the Regional Coordinator on appropriate justification of services provided outside the natural environment.  A contract with a web-hosting service was approved in July, 2009 and modules are available on line.
Implement a rate increase for services provided in	9/1/2008-	The rate increase, discussed earlier, was appropriated by the

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Improvement Activities-	Timelines	Discussion/Progress/Slippage for 2008-2009
Indicator 2		
natural environments.	6/30/2010	legislature 6/30/2008. Due to program growth, there were not sufficient funds to increase all service provider rates. Therefore, the 25% rate increase was applied to those services provided in natural environments as a means of increasing opportunities for service delivery in natural environments as well as to address provider concerns about travel costs during that time.

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#### Part C State Performance Plan (SPP Template) for FFY 2008-2009

#### Overview of the State Performance Plan Development - Indicator 3:

#### **Background**

EarlySteps has policy and procedures in place to provide a multidisciplinary assessment of each child for eligibility determination, IFSP development and outcomes measurement. The procedures are contained in the Practice Manual, posted on the EarlySteps website and utilized in training with providers, families and others during provider enrollment, provider training, and monitoring activities.

#### Multidisciplinary Assessment

Multidisciplinary assessment information includes health history, medical information, developmental screenings, developmental assessments, early intervention provider reports and parent concerns priorities and resources. All children referred to EarlySteps are screened with the *Ages and Stages Questionnaire* (ASQ).

#### Effective July 1, 2007:

Prior to the transition of the EarlySteps system to OCDD, the decision was made to use the BDI-2 as the sole tool for eligibility determination and outcome assessment. Prior to that time, there were 3 tests used for eligibility determination and the AEPS was to be used for outcome measurement. The discussion which follows reflects practices and results of both processes.

Children who have identified concerns on the ASQ are scheduled for developmental assessment using the Battelle Developmental Inventory (BDI-2). This information is used to assist with identification of the child's unique strengths and needs and the identification of services appropriate to meet such needs. Prior to the annual re-determination of eligibility, all children are re-assessed with the BDI-2. The BDI-2 became the sole statewide tool used for eligibility determination and outcome measurement July 1, 2007.

Following the administration of the BDI-2 and eligibility determination, a written IFSP is developed and includes a summary of the family's concerns, priorities and resources to enhance the development of their child. In addition, the child's present level of physical functioning (fine and gross motor), cognitive development, communication development (receptive and expressive language), social/emotional development and adaptive development are recorded on the IFSP, using information from the multidisciplinary assessment. Health status information, including hearing and vision screenings, are obtained from the child's primary care provider or other appropriate health care providers, as well as from parent report.

Each child and family outcome on the IFSP is based on the family's concerns and priorities and includes timelines and a means to measure progress. In addition, pre-literacy and language strategies, as developmentally appropriate, are included with each child outcome on the IFSP.

#### **Outcomes Measurement**

Beginning in 2004 through June, 2007 the Assessment, Evaluation and Programming System for Infants and Children, 2<sup>nd</sup> Edition-Research Version-Level 1 (AEPS-RV) was planned for use to collect baseline and exit child outcomes data for children with IFSP's.

Baseline entry data, detailed in the tables which follow, revealed that the majority of children assessed using the AEPS-RV were found to be functioning at a level comparable to their same-aged peers in the areas of social-emotional skills, acquisition and use of knowledge and skills, and use of appropriate behaviors to meet their needs.

For the February, 2008, SPP progress report of data collection for this indicator, issues regarding the validity of the data were discussed. As a result, it was determined to disregard the initial data collected with the AEPS-RV and recollect entry data. The BDI2 was in use as an eligibility determination tool during the 2005-2006 reporting period (February, 2006 –June, 2006). The results of those evaluations were collected for all children from whom the tool was used in that time period

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and are shown below for entry data for 2006-2007. In addition, outcomes data is presented for the current reporting period.

#### Monitoring Priority: Early Intervention Services In Natural Environments

Indicator 3: Percent of infants and toddlers with IFSPs who demonstrate improved:

- A. Positive social-emotional skills (including social relationships);
- B. Acquisition and use of knowledge and skills (including early language/ communication); and
- C. Use of appropriate behaviors to meet their needs.

(20 U.S.C. 1416(a)(3)(A) and 1442)

#### Measurement:

- A. Positive social-emotional skills (including social relationships):
  - a. Percent of infants and toddlers who did not improve functioning = [(# of infants and toddlers who did not improve functioning) divided by (# of infants and toddlers with IFSPs assessed)] times 100.
  - b. Percent of infants and toddlers who improved functioning but not sufficient to move nearer to functioning comparable to same-aged peers = [(# of infants and toddlers who improved functioning but not sufficient to move nearer to functioning comparable to same-aged peers) divided by (# of infants and toddlers with IFSPs assessed)] times 100.
  - c. Percent of infants and toddlers who improved functioning to a level nearer to same-aged peers but did not reach it = [(# of infants and toddlers who improved functioning to a level nearer to same-aged peers but did not reach it) divided by (# of infants and toddlers with IFSPs assessed)] times 100.
  - d. Percent of infants and toddlers who improved functioning to reach a level comparable to same-aged peers = [(# of infants and toddlers who improved functioning to reach a level comparable to same-aged peers) divided by (# of infants and toddlers with IFSPs assessed)] times 100.
  - e. Percent of infants and toddlers who maintained functioning at a level comparable to sameaged peers = [(# of infants and toddlers who maintained functioning at a level comparable to same-aged peers) divided by (# of infants and toddlers with IFSPs assessed)] times 100.

If a + b + c + d + e does not sum to 100%, explain the difference.

- B. Acquisition and use of knowledge and skills (including early language/communication and early literacy):
  - a. Percent of infants and toddlers who did not improve functioning = [(# of infants and toddlers who did not improve functioning) divided by (# of infants and toddlers with IFSPs assessed)] times 100.
  - b. Percent of infants and toddlers who improved functioning but not sufficient to move nearer to functioning comparable to same-aged peers = [(# of infants and toddlers who improved functioning but not sufficient to move nearer to functioning comparable to same-aged peers) divided by (# of infants and toddlers with IFSPs assessed)] times 100.
  - c. Percent of infants and toddlers who improved functioning to a level nearer to same-aged peers but did not reach it = [(# of infants and toddlers who improved functioning to a level nearer to same-aged peers but did not reach it) divided by (# of infants and toddlers with IFSPs assessed)] times 100.
  - d. Percent of infants and toddlers who improved functioning to reach a level comparable to

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same-aged peers = [(# of infants and toddlers who improved functioning to reach a level comparable to same-aged peers) divided by (# of infants and toddlers with IFSPs assessed)] times 100.

e. Percent of infants and toddlers who maintained functioning at a level comparable to sameaged peers = [(# of infants and toddlers who maintained functioning at a level comparable to same-aged peers) divided by (# of infants and toddlers with IFSPs assessed)] times 100.

If a + b + c + d + e does not sum to 100%, explain the difference.

- C. Use of appropriate behaviors to meet their needs:
  - a. Percent of infants and toddlers who did not improve functioning = [(# of infants and toddlers who did not improve functioning) divided by (# of infants and toddlers with IFSPs assessed)] times 100.
  - b. Percent of infants and toddlers who improved functioning but not sufficient to move nearer to functioning comparable to same-aged peers = [(# of infants and toddlers who improved functioning but not sufficient to move nearer to functioning comparable to same-aged peers) divided by the (# of infants and toddlers with IFSPs assessed)] times 100.
  - c. Percent of infants and toddlers who improved functioning to a level nearer to same-aged peers but did not reach it = [(# of infants and toddlers who improved functioning to a level nearer to same-aged peers but did not reach it) divided by the (# of infants and toddlers with IFSPs assessed)] times 100.
  - d. Percent of infants and toddlers who improved functioning to reach a level comparable to same-aged peers = [(# of infants and toddlers who improved functioning to reach a level comparable to same-aged peers) divided by the (# of infants and toddlers with IFSPs assessed)] times 100.
  - e. Percent of infants and toddlers who maintained functioning at a level comparable to sameaged peers = [(# of infants and toddlers who maintained functioning at a level comparable to same-aged peers) divided by the (# of infants and toddlers with IFSPs assessed)] times 100.

If a + b + c + d + e does not sum to 100%, explain the difference.

#### Summary Statements for Each of the Three Outcomes (use for FFY 2008-2009 reporting):

**Summary Statement 1:** Of those infants and toddlers who entered or exited early intervention below age expectations in each Outcome, the percent who substantially increased their rate of growth by the time they turned 3 years of age or exited the program.

#### **Measurement for Summary Statement 1:**

Percent = # of infants and toddlers reported in progress category (c) plus # of infants and toddlers reported in category (d) divided by [# of infants and toddlers reported in progress category (a) plus # of infants and toddlers reported in progress category (b) plus # of infants and toddlers reported in progress category (c) plus # of infants and toddlers reported in progress category (d)] times 100.

**Summary Statement 2:** The percent of infants and toddlers who were functioning within age expectations in each Outcome by the time they turned 3 years of age or exited the program.

**Measurement for Summary Statement 2:** Percent = # of infants and toddlers reported in progress category (d) plus [# of infants and toddlers reported in progress category (e) divided by the total # of infants and toddlers reported in progress categories (a) + (b) + (c) + (d) + (e)] times 100.

#### State Performance Plan 2004-2005 Baseline Entry AEPS Data

- A. Positive social-emotional skills (including social relationships:)
  - a. 91.4 % of children functioning at a level comparable to same aged peers.
  - b. 8.6 % of children functioning at a level below same aged peers.
- B. Acquisition and use of knowledge and skills
  - a. 93.8 % of children functioning at a level comparable to same aged peers.
  - b. 6.2 % of children functioning at a level below same aged peers.
- C. Use of appropriate behaviors to meet their needs
  - a. 88.9 % of children functioning at a level comparable to same aged peers.
  - b. 6.2 % of children functioning at a level below same aged peers.

BDI-2 Entry Data - BDI-2 Assessments conducted from May - December, 2006

DDI Z Entry Data DDI Z Assessments conducted from may December, 20						
Domain	Children En	•	Children En	Totals		
	Comparable	to Same-	same-age p			
	age peers		Number	%		
	Number	%				
A. Positive Social	39	75%	13	25%	52	
emotional skills						
B. Acquisition and use of						
knowledge						
Communication Domain	54	71%	22	29%	76	
C. Use of Appropriate						
behaviors to meet their						
needs						
Physical Domain	45	76%	14	24%	59	
Total children assessed					76	

#### **Discussion of BDI-2 Baseline Entry Data:**

The entry data reported here represents BDI-2 assessment data for a total of 76 individual children. Not all of the children received assessment in all domains as can be seen above in the totals which vary across the domains. This variation occurred because several tests were in use at the time and one domain of the BDI-2 could be used as a single domain assessment to substantiate eligibility. It was anticipated that this variation would not occur for the 2008-2009 reporting period because the BDI-2 is now the single tool required for eligibility and is also used for outcome reporting. When this entry data was analyzed, the current definition of the EarlySteps eligibility criteria was applied to establish comparability to same-age peers (became effective July 1, 2007). That is, children qualify with a -1.5 standard deviation in one domain. Therefore, children functioning at a level comparable to same-age peers had z-scores or standard deviations of above –1.5, and children functioning at a level below comparable same-age peers had a standard deviation below –1.5.

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Progress Data for 2006-2007 using AEPS

Baseline Data at Entry in EarlySteps with the AEPS-RV 5/2006-10/2006	Measurable and Rigorous Target 2006-2007	AEPS Progress Data at exit of child from EarlySteps -2006-2007	
		Number of children	% of children
A. Positive social-emotional skills (including social	A. Positive social-emotional skills (including social relationships):	A. Positive Social- emotional	A. Positive Social- Emotional skills
relationships):  a. 91.4% of children functioning at a level	a. 1 % percent of infants and toddlers who did not improve functioning.	a. 44	a.19.7%
comparable to same-aged peers. N=1576  b. 8.6% of children functioning at a level below same-aged peers N= 149	<ul> <li>b. 3.3 % percent of infants and toddlers who improved functioning but not sufficient to move nearer to functioning comparable to same-aged peers.</li> </ul>	b. 11	b. 4.9%
	c. 3.3 % percent of infants and toddlers who improved functioning to a level nearer to same-aged peers but did not reach it.	c. 34	c.15.2%
	d. 1 % percent of infants and toddlers who improved functioning to reach a level comparable to same-aged peers.	d. 01	d. 0.4%
	91.4% percent of infants and toddlers who maintained functioning at a level comparable to same-aged peers.	e.133	e.59.6%
N=1725	Totals	N=223	100%
B. Acquisition and use of knowledge and skills			
a. 93.8% of children functioning at a level comparable to same-aged peers N=1618	Acquisition and use of knowledge and skills     (including early language/communication and early literacy)	B. Use of Knowledge	B. Use of Knowledge
b. 6.2% of children functioning at a level below same-aged peers. N=107	a. 1 % percent of infants and toddlers who did not improve functioning.	a. 24	a.10.76%
Total N=1725	<ul> <li>b. 2.1 % percent of infants and toddlers who improved functioning but not sufficient to move nearer to functioning comparable to same-aged peers.</li> </ul>	b. 3	b.1.35%

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Baseline Data at Entry in EarlySteps with the AEPS-RV 5/2006-10/2006	Measurable and Rigorous Target 2006-2007	AEPS Progress Data at exit of child fro EarlySteps -2006-2007	
	c. 2.1 % percent of infants and toddlers who improved functioning to a level nearer to same-aged peers but did not reach it.	c. 15 c.6.7%	
	d. 1 % percent of infants and toddlers who improved functioning to reach a level comparable to same-aged peers.	d. 0 d.0%	
	e. 93.8 % percent of infants and toddlers who maintained functioning at a level comparable to same-aged peers.	e. 181 e.81.29	
	Totals	n=223 100%	
C. Use of appropriate behaviors to meet their needs.	C. Use of appropriate behaviors to meet their needs:	C. Use appropriate C. Use appropriate behavior behavior	
a. 88.9% of children functioning at a level comparable to same-aged peers N=1534	a. 1 % percent of infants and toddlers who did not improve functioning.	a.24 a.10.76%	
b. 6.2% of children functioning at a level below same-aged peers. N= 191	<ul> <li>b. 4.5 % percent of infants and toddlers who improved functioning but not sufficient to move nearer to functioning comparable to same-aged peers.</li> </ul>	b.12 b. 5.38%	
	c. 4.6 % percent of infants and toddlers who improved functioning to a level nearer to	c. 32 c.14.3%	
	same-aged peers but did not reach it.  d. 1 % percent of infants and toddlers who improved functioning to reach a level	d.1 d.0.4%	
	comparable to same-aged peers.	e.154 e.69.05%	
	e. 88.9 % percent of infants and toddlers who maintained functioning at a level comparable to same-aged peers.		
Total N=1725	Totals	n=223 100%	

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#### **Data Source and Measurement Considerations**

#### Discussion of Baseline AEPS Entry Data - 2005-2006:

The following reviews the baseline data collection process from the State Performance Plan posted on the EarlySteps website at <a href="https://www.earlysteps.dhh.louisiana.gov">www.earlysteps.dhh.louisiana.gov</a>.

#### Summary of Data Analysis-Entry Data

EarlySteps analyzed raw AEPS-RV scores from May 1, 2006-October 31, 2006 for each outcome.

#### Number of children assessed:

- Data for 1767 children were collected using the AEPS Test Level I.
- Due to data errors and/or incomplete data 42 children were removed from the final analysis.
- Total of 1725 children between 1 month and 35 months comprised the final sample.

#### Chronological age:

- Children's chronological age was calculated by subtracting the child's date of birth (DOB) from the Test date when the AEPS was scored. Children's age in months was rounded to the next month when over 15 days passed since the day on which the child was born.
- Teams were not instructed to adjust for prematurity.

#### Criteria used to determine performance as same age peers:

- The AEPS Test has been constructed to provide benchmarks for reliable comparison with same-aged peers (as defined by OSEP). AEPS benchmarks were constructed using a national non-random sample of children with the chronological ages of birth through 5 years. Age expected functioning scores for AEPS items aligned with OSEP child outcomes were converted to logits under the Rasch One-Parameter model using WINSTEPS 3.61.1.
- Rasch measures (logits) were used to establish age expected functioning cut-scores
  utilizing OSEP 90/10 criterion for three month intervals with two exceptions. A single age
  interval was used for the age range of 0-6 months and same age peer benchmark scores
  deviated from the 90/10 recommendation for Outcome 2 between birth and 21 months to
  maintain a linear progression of scores.
- The OSEP 90/10 criteria were established with a regression-informed line. Children with scores at the line or above were considered to be functioning at the same level as their same-aged peers. For ease of interpretation, the Rasch measures (logits) were transformed back to the AEPS scale (i.e., converted to same age peer benchmarks scores).
- Children with scores (derived from performance on AEPS Test items aligned to OSEP child outcomes) below the regression-informed line (same age peer benchmark) were considered not to be functioning as their same aged peers (=b "basket"). Children with scores at or above the regression-informed line (same age peer benchmark) were considered to be functioning as their same age peers (=a "basket").

#### **Outcome One**

A total of 44 AEPS Tests Level I items align to OSEP Outcome 1 resulting in a total possible score for Outcome 1 of 88. Children's scores for Outcome 1 in Louisiana Part C program ranged from 0 to 88 with a mean score of 49.94 (SD=23.5).

1576 children were performing as same age peers

Percentage of children performing as same age peers (a) = 91.4% for Outcome 1 149 children were not performing as same age peers

Percentage of children not performing as same age peers (b) = 8.6% for Outcome 1

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#### **Outcome Two**

A total of 64 AEPS Test Level I items align to OSEP Outcome 2 resulting in a total possible score for Outcome 2 of 128. Children's scores for Outcome 2 in Louisiana Part C program ranged from 0 to 128 with a mean score of 33.13 (SD=26.20).

1618 children were performing as same age peers

Percentage of children performing as same age peers (a) = 93.8% for Outcome 2

107 children were not performing as same age peers

Percentage of children not performing as same age peers (b) = 6.2% for Outcome 2

#### **Outcome Three**

A total of 96 AEPS Test Level I items align to OSEP Outcome 3 resulting in a total possible score for Outcome 3 of 192. Children's scores for Outcome 3 in Louisiana Part C program ranged from 0 to 192 with a mean score of 101.17 (SD=50.19).

1534 children were performing as same age peers

Percentage of children performing as same age peers (a) = 88.9% for Outcome 3 191 children were not performing as same age peers

Percentage of children not performing as same age peers (b) = 11.1% for Outcome 3

#### **Baseline Data Source Considerations**

Threats to the validity of the outcome scores calculated based on the sample of 1767 children that were tested with the AEPS from May 1, 2006 through October 31, 2006, range from test implementation to data entry errors. It is therefore necessary that the results be interpreted in light of multiple sources of bias. Practitioners who provided the diagnostic assessment were determined to implement the test in a non-uniform manner. This subsequently introduced a significant source of information bias through a low inter and intra-rater reliability value. The magnitude of this has yet to be determined; however reports from the field indicate non-random test implementation occurred. Possible sources of this bias may be lack of extensive training on test implementation, as well as supervision of implementation and score calculation.

Another noted source of potential bias relates to the aggregation of test scores. Although calculations compare the sample to a same age peer comparison, developmental delay determination is frequently not as apparent in younger children.

## Discussion of Progress Data for Measuring Child Outcomes – Activities of 2006-2007 Reporting Period

Following results from entry data analysis, additional training on the AEPS was planned by the Office of Public Health as proposed in the SPP addendum submitted in February, 2007. Due to the problems described above with the AEPS-RV and implementation process, the decision was made by OPH to change to the use of the BDI-2 for collection of child outcome data for this indicator. This decision was made just prior to the transition of EarlySteps to OCDD and the use of the BDI-2 became effective in July, 2007. As a result of this decision, the transition of the program, staffing changes and shortages, and the short time frame available to develop a process for comparing outcomes from the baseline entry data using the AEPS-RV and exit data with the BDI-2, it was decided to report exit data for this time period only using scores for those children for whom exit data was obtained using the AEPS-RV.

Data Analysis – Exit Data- Description of Selection Process for Children Included in Analysis

The raw data table of the 1725 children from whom entry data was collected was used to make comparisons with exit scores. Exit AEPS-RV scores from all children who exited the program during 2006-2007 and for whom exit scores were available with the AEPS-RV were collected by the 9 regional coordinators. Scores were available for 223 children or 13% of the total possible,

from the 1725 children in the original cohort. Criteria for inclusion in the cohort include: child exited during the reporting period, child had been in EarlySteps for six months, child was among cohort from whom AEPS-RV entry data was collected, exit scores were obtained using the AEPS-RV. Children were represented from all 9 regions of the state and ranged in age from 22-36 months at exit. The majority of children (197 or 89%) were between 30 and 36 months of age, 147 children were between 34 and 36 months. Only 7 children were 24 months or less. Data from all 223 is included and summarized in the table which follows.

The same procedure described above for the baseline data collection process was used to collect and compare each child's entry and exit scores. The exit scores were compared to same age peer benchmark scores and placed in "a" or "b" categories/baskets and determined to improve, to remain the same, or to regress. Children were then categorized according the measurement categories ("a" through "e" as described in the Measurement Table above) for each outcome. Placement of child results into the "a" through "e" measurement categories was determined based on descriptions for the ECO Center report: OSEP's Revised Child Outcomes Reporting Requirements for Part C and Part B/619 Programs: What the Changes Mean for States (September 7, 2006). Application of the decision-making process follows:

ECO Center Description	Early Steps Determination of Child Placement		e area res V – 3 skill	
a. Percentage who did not improve functioning—     Children acquired no new skills or	No improvement in exit scores or Regression (decrease) of scores	1.N=44	2.N=24	3.N=24
behaviors or their level regressed between entry and exit		19.7%	10.76%	10.76%
b. Percentage who improved, but not sufficient to move nearer to functioning comparable to same- aged peers—children acquired new skills and behaviors but there	Child showed improvement in exit scores Child entered in "a" basket and exited in "b" basket	1 N=11	2 N= 3	3N=12
has been no positive change in their developmental trajectories. At exit skills were at the same or lower rates than at entry		4.9%	1.35%	5.38%
c. Percentage who improved functioning to a level nearer same age peers, but did not reach it—these children acquired skills at a	Child showed improvement in exit scores Child entered in "b" basket and Exited in "b" basket	1N= 34	2N=15	3N= 32
faster rate, there was a positive change, but they had not attained functioning comparable to sameaged peers at exit.		15.2%	6.7%	14.3%
d. Percentage who improved functioning to reach a level comparable to same-aged peers—children did not show	Child showed improvement in exit scores Child entered in "b" basket and Exited in "a" basket	1N= 1	2N= 0	3N=1
functioning comparable to sameaged peers at entry, but did at exit.		0.4%	0	0.4%
e. Percentage who maintained functioning at a level comparable to same-aged peers—children  Child showed improvement in exit scores Child entered in "a" basket and		1N= 133	2N=181	3N=154
showed functioning comparable to same-aged peers at entry and exit.	Exited in "a" basket.	59.64% Total= 223	81.2% Total = 223	69.05% Total= 223

\* See preceding table:

Outcome 1=Positive social-emotional skills

Outcome 2=Acquisition and use of knowledge and skills (including language and literacy)

Outcome 3= Appropriate behaviors to meet their needs.

#### **Exit Data Source Considerations**

- As expected, based on the baseline entry data using the AEPS-RV in Louisiana in FFY 2005, the largest numbers of children had exit scores in category "e" (59.64%, 81.2%, and 69.05%, respectively). This has been interpreted to describe the children as entering and exiting at a level comparable to same-aged peers. This high percentage was discussed in the analysis of the baseline entry data above and was possibly a function of the sensitivity of the test, especially in view of Louisiana's narrow eligibility criteria in use during the time period from which entry data was collected.
- Unexpected, however, was the high number of children who showed no progress or who
  regressed (19.7%,10.7%,10.7%). This could be a function of baseline data source
  considerations described above, including inconsistent test administration across
  practitioners. Test-Retest reliability should also be considered.
- The next largest group of scores across 2 out of the 3 (15.2%, 6.7%, 14.3%) outcome areas fell into category "c," that is, children who showed improvement but who were not functioning comparable to same-aged peers at exit. These children entered in the "a" basket, improved, and exited in the "b" basket, interpreted to mean that although they showed improvement, these children were below the "cut-off" scores compared to agelevel peers at exit. These children may have entered in the "b" basket if another test (with greater sensitivity) had been utilized for collection of baseline data.
- Very low numbers of children were identified in category "d," interpreted as children who entered below age level peers, who showed improvement, but exited comparable to same age peers. This means there was only 1 child who entered in the "b" basket and exited in the "a" basket. Reasons for this result could include the decision making process used to apply this determination in Louisiana or could be a reflection of the large numbers of children who entered at age level according to the AEPS-RV.

The analyses of the exit data with the AEPS-RV are informative for experience in making decisions regarding future data collection, determination of placement into the OSEP categories, and for developing/selecting a data collection and reporting system. However, as a result of the program transition to OCDD and the implementation of the use of the BDI-2, effective July, 2007, it felt that sufficient information is not available at this time to adjust previously submitted targets for 2008-2009. Also, Louisiana requested from OSEP, the opportunity to recollect baseline data using the BDI-2, due to the changes discussed above and due to the results of the AEPS-RV data.

#### Progress Report for Measuring Child Outcomes - Activities of 2007-2008 Reporting Period

As discussed in the Overview section (page 4), with the transition of EarlySteps to OCDD, the BDI2 was selected as the sole tool for eligibility determination and outcome measurement. An EIDS system modification was made to accommodate entering of BDI2 scores by the SPOE's. For the FFY 2006 APR, charts were reviewed for all children for whom entry and exit scores were available using the AEPS-RV. For reporting entry data for FFY 2007, entry data was collected on children who had previously been assessed using the BDI-2 (prior to July, 1 2007 requirement). Entry scores are collected during eligibility determination and are reported above for 76 children. For progress reporting for FFY 2007, a data report was developed in EIDS to collect entry and exit scores for children who had been in the program for at least 6 months. Results were obtained from 96 children.

The process for categorizing entry and exit scores to place children in OSEP's categories a. through e. may be summarized as follows:

- Entry and exit data was collected for children exiting from July 1, 2007 through June 30, 2008 who had been in the system for a minimum of 6 months. Data was collected on 96 children.
- Children were considered to be functioning at a level *below same-age peers* if the standard score for the domain was below 78 or if the z-score was greater than –1.47. These scores were chosen because they are commensurate with the eligibility criteria for Louisiana of 1.5 standard deviations below the mean. Scores at or below 80 or a z-score less than –1.47 and at or greater than –1.33 were considered to be *a level nearer to same-age peers*. Standard scores above 80 or a z-score less than 1.33 are considered to be *comparable to same age peers*. This distinction recognizes that children may not qualify for EarlySteps services but may still be functioning below typically developing peers. According to the *BDI-2 Examiner's Manual* (page 74), children with standard scores below 80 (but above the 78 cut off for EarlySteps) fall into a mild developmental delay category.
- Exit assessment is defined at the latest BDI-2 administered for annual eligibility determination or the "exit outcomes assessment" prior to the child's exit. The child must have been in the program for 6 months.
- The BDI-2 developmental domains were utilized for reporting as follows:
  - 1. The Personal-Social Domain was used to report "positive social-emotional skills, including social relationships."
  - 2. The Communication Domain was used to report "acquisition and use of knowledge and skills (including early language/communication)."
  - 3. The Motor Domain was used to report the "use of appropriate behavior to meet needs."

The process for determining progress and placing a child in one of the five OSEP reporting categories was taken from the ECO Center report referenced above and applied as follows:

- a. Children in this reporting category either acquired no new skills or behaviors, or their level of functioning regressed between entry and exit. Category a. includes children whose exit scores were at or below their entry score, regardless of whether they were functioning typically at entry or not.
- b. Children in this category improved functioning, but not sufficient to move nearer to functioning comparable to same-age peers. These children had improved exit scores and had a standard score between 78 and 80 and a z-score of –1.47 to –1.33, placing them out of the eligibility score for EarlySteps but still within "mild developmental delay" category according to the BDI2.
- c. Children in this category entered below typical peers and whose exit scores were improved from their entry score but they exited below "typical" or with less than a standard score of 78 or z-score of –1.47 for that developmental domain. Scores in this category would generally indicate continuing eligibility for EarlySteps.
- d. Children in this category entered below typical peers and whose exit scores were improved with a standard score at or greater than 80 at exit indicating improvement to a level comparable to same-age peers.
- e. Children in this category entered at or above their same-age peers, with standard scores of 80, who showed improvement at exit with standard scores above 80.

2007-2008 Child Outcome Data - BDI-2 at Entry and Exit:

	2007-2008 Child Outcome Data – BDI-2 at Entry and Exit:						
ECO Center Description	Early Steps Determination of	Outcome area results'					
	Child Placement	PS	COM	Motor			
a. Percentage who did not	No improvement in exit scores or	1.N=51	2.N=48	3.N=49			
improve functioning—	Regression (decrease) of scores						
Children acquired no new skills or	Includes children with scores in	53%	50%	49%			
behaviors or their level regressed	typical range and well as those	0070	0070	1070			
between entry and exit	below typical peers.						
b. Percentage who improved, but	Child showed improvement in exit	N=1	N=0	N=0			
not sufficient to move nearer to	scores						
functioning comparable to same-	BDI-2 standard scores were						
aged peers—children acquired	improved, but remain between 78-						
new skills and behaviors but there	80.	1%	0%	0%			
has been no positive change in							
their developmental trajectories. At exit skills were at the same or							
lower rates than at entry							
c. Percentage who improved	Child showed improvement in exit	N=16	N=13	N=18			
functioning to a level nearer same	scores	IN=IO	N=13	IN=10			
age peers, but did not reach it—	300163						
these children acquired skills at a	Entry score below 78, BDI-2						
faster rate, there was a positive	standard scores were improved,	17%	14%	19%			
change, but they had not attained	but remain below 78.	17 70	1170	1070			
functioning comparable to same-							
aged peers at exit.							
d. Percentage who improved	Child showed improvement in exit	N=4	N=4	N=4			
functioning to reach a level	scores						
comparable to same-aged							
peers—children did not show	BDI-2 standard scores were	4%	4%	4%			
functioning comparable to same-	below 78, improved at or above	470	470	470			
aged peers at entry, but did at	80.						
exit.							
e. Percentage who maintained	Child showed improvement in exit	24	31	25			
functioning at a level comparable	scores						
to same-aged peers—children	<b></b>						
showed functioning comparable to	BDI-2 entry score at 80 or above,	25%	32%	26%			
same-aged peers at entry and	with improvement, exit above 80.						
exit.	Tatal 00	NL OC	NL OC	N OC			

<sup>\*</sup> See preceding table:

Total =96 N=96

=96 N

N=96 N=96

Outcome 1=Positive social-emotional skills

Outcome 2=Acquisition and use of knowledge and skills (including language and literacy)

Outcome 3= Appropriate behaviors to meet their needs.

#### FFY 2007 Exit Data Discussion:

Children residing in all regions of the state are included in the cohort of 96 children. The average age at the time of the exit assessment was 26 months. The average time between entry and exit assessment was 12 months. The numbers of children across the 3 outcome areas was consistent for all categories (a-e). Approximately 50% of the children exited with scores comparable to same-age peers.

Analysis of child outcome results produced unexpected results again this reporting period:

- The number of children in category a, that is, those with no progress or with regression.
   Approximately 50% of the 96 children with scores reported showed no progress or had regression as indicated by BDI-2 scores. Results were consistent across the three outcome areas. Two possible reasons are being considered:
  - The use of the BDI-2 was relatively new to most providers since its use was not required until July 1, 2007. This factor may have effected the administration and performance measurement as examiners became more proficient with the test over time. The second administration of the test may have better represented a child's performance.
  - Item analysis was not used for reporting a child's progress, only the standard deviations were compared. This measure alone may not be sensitive enough to measure changes in performance.
  - 3. Of the children placed in category a, approximately 46% had entry and exit scores comparable to same age peers, despite scores which were flat or showed regression. The decision rule to include all children who made no progress or showed regression including those with scores of same-age peers may have inflated the numbers in category a.
- The number of children in category b, that is, those who improved, but not sufficient to move nearer to same-age peers. The decision rule to make this determination was based on a standard score between 78 and 80. Virtually no children fell in this category. It is felt that the score range is too narrow to be used to place children in category b.
- The low numbers of children in category d compared with the relatively higher numbers of children in category e. Since 25-32% of the children entered comparable to same-age peers, it was anticipated that more children (as compared to the 4% result across the outcome areas) would have exited near typical peers.
- Despite results for categories a and b, results for categories c and e are not unlike those reported by other states in FFY 2006 as reported in the 2008 Indicator Analyses document—
  - 1. Category c: Other states=18.5%, 23.7%, 16.5% EarlySteps= 17%, 14%, 19%
  - 2. Category e: Other states=34.15, 24.5%, 32.2% EarlySteps=25%, 32%, 26%

Lead agency staff has requested assistance from SICC committees to re-assess the process by which the children are placed in categories a-d for more accurate interpretation of child outcomes. In addition, using scoring processes available with the BDI-2 through the publisher will allow for more indepth analysis of child performance.

#### **Technical Assistance Resources used:**

- The ECO Outcomes Conferences and OSEP Conferences in 2007 and 2008: many of the resource materials were reviewed for decision making for reporting progress data, making decisions about applying data to the 5 reporting areas, and interpreting results
- ECO Center website used for the concept papers used for analysis of the data and for reporting formats
- Discussions with and review of other states' materials who are using similar procedures
- ECO Center/NECTAC TA call addressing this indicator in June, 2007, Trends in the Child Outcomes Data, comparing progress data across states, supporting the decision that the 2005-2006 entry data was not valid.
- Part C SPP/APR 2008 Indicator Analyses (FFY 2006-2007): used for analysis of outcome data

Progress Report for Measuring Child Outcomes – Activities of 2008-2009 Reporting Period

For the 2008-2009 reporting period, an EIDS data report was used to report on child outcomes. Data was reviewed for all children for whom the BDI-2 entry and exit data was available and who exited the system between July 1, 2008 and June 30, 2009. The data analysis for 256 children who met the inclusion criteria are shown in the table which follows. The same methodology used to place children in reporting categories a-e last year was applied for this reporting period.

#### 2008-2009 Child Outcome and Baseline Data - BDI-2 at Entry and Exit:

ECO Center Description	Early Steps Determination of	Outcome area results*		lts*
·	Child Placement	PS	COM	Motor
a. Percentage who did not improve functioning—     Children acquired no new skills	No improvement in exit scores or Regression (decrease) of scores Includes children with scores in	1.N=147	2.N=101	3.N=110
or behaviors or their level regressed between entry and exit	typical range and well as those below typical peers.	57.4%	39.5%	43%
b. Percentage who improved, but not sufficient to move nearer to functioning comparable to same-aged peers—children	Child showed improvement in exit scores BDI-2 standard scores were improved, but remain between 78-80.	N=16	N=31	N=14
acquired new skills and behaviors but there has been no positive change in their developmental trajectories. At exit skills were at the same or lower rates than at entry	70-00.	6.3%	12.1%	5.5%
c. Percentage who improved functioning to a level nearer same age peers, but did not reach it—these children	Child showed improvement in exit scores  Entry score below 78, BDI-2	N=10	N=50	N=15
acquired skills at a faster rate, there was a positive change, but they had not attained functioning comparable to same-aged peers at exit.	standard scores were improved, but remain below 78.	3.9%	19.5%	5.9%
d. Percentage who improved functioning to reach a level comparable to same-aged	Child showed improvement in exit scores	N=31	N=48	N=36
peers—children did not show functioning comparable to same- aged peers at entry, but did at exit.	BDI-2 standard scores were below 78, improved at or above 80.	12.1%	18.8%	14.1%
e. Percentage who maintained functioning at a level comparable to same-aged	Child showed improvement in exit scores	N=52	N=26	N=81
peers—children showed functioning comparable to sameaged peers at entry and exit.	BDI-2 entry score at 80 or above, with improvement, exit above 80.	20.3%	10.2%	31.6%
* See above table:	Total =100%	N=256	N=256	N=256

Outcome 1=Positive social-emotional skills

Outcome 2=Acquisition and use of knowledge and skills (including language and literacy)

Outcome 3= Appropriate behaviors to meet their needs.

#### FFY 2008 Exit/Baseline Data Discussion

The same process as that used for FFY 2007 for analysis of the child outcome data was used for this reporting period. Children included in the results represent all geographic areas of the state. Average age at entry was 19.8 months and average age at exit was 33.3 months. Average time in early intervention services was 13.4 months.

A comparison of results for the reporting Categories across both years is shown:

ECO Center Description		ome 1	Outcor		Outcor	ne 3
a. Percentage who did not improve functioning—	PS FFY	PS FFY	Comm FFY	Comm FFY	Motor FFY	Motor FFY
Children acquired no new skills or behaviors or their level regressed between entry and exit	<b>2007</b> 53.1%	<b>2008</b> 57.4%	<b>2007</b> 50%	<b>2008</b> 39.5%	<b>2007</b> 49%	<b>2008</b> 43.0%
b. Percentage who improved, but not sufficient to move nearer to functioning comparable to same-aged peers—children acquired new skills and behaviors but there has been no positive change in their developmental trajectories. At exit skills were at the same or lower rates than at entry	1%	6.3%	0%	12.1%	0%	5.5%
c.Percentage who improved functioning to a level nearer same age peers, but did not reach it—these children acquired skills at a faster rate, there was a positive change, but they had not attained functioning comparable to same-	16.7%	3.9%	13.5%	19.5%	18.8%	5.9%
d. Percentage who improved functioning to reach a level comparable to same-aged peers—children did not show functioning comparable to sameaged peers at entry, but did at exit.	4.2%	12.1%	4.2%	18.8%	4.2%	14.1%
e. Percentage who maintained functioning at a level comparable to same-aged peers—children showed functioning comparable to same-aged peers at entry and exit	25.0%	20.3%	32.3%	10.2%	26%	31.6%
Totals	100%	100%	100%	100%	100%	100%

In reviewing outcome results across the two fiscal years, percentage results for the reporting categories were not consistent across the two fiscal years in most cases. See table above. The low number of children (96) reported for FFY 2007 may explain the variations of these results across the two years. However, when results for the two years are combined, the trends across FFY 2008 and the two years combined are generally consistent within 3-4 percentage points. One exception

occurred for reporting category e for use of knowledge with a difference of six percentage points. The table below shows the percentage results for FFY 2007, FFY 2008 and the two years combined:

Social	2007-08	2008-09	Both	All 2207*	All 2008*
а	53.1	57.4	56.3	6.4	6.3
b	1	6.3	4.8	16.6	17.3
С	16.7	<mark>3.9</mark>	7.4	18.4	15.9
d	4.2	12.1	9.9	24	23.6
е	25	20.3	21.6	34.1	37.6
Totals	100	100	100	99.5	100.7
Know	2007-08	2008-09	Both		
а	50	39.5	42.3	5.7	5.5
b	0	12.1	8.8	<b>17.8</b>	19.1
С	13.5	<mark>19.5</mark>	17.9	23.7	20.7
d	4.2	18.8	14.8	28.2	30.1
е	32.3	10.2	16.2	24.5	25.3
Totals	100	100.1	100	99.9	100.7
Meet	0007.00	0000 00	D. 41		
need	2007-08	2008-09	Both		
а	51	43	45.2	5.5	4.2
b	0	5.5	4	16.6	16.8
С	18.8	<mark>5.9</mark>	9.4	16.5	17.1
d	4.2	14.1	11.4	29.2	29.3
е	26	31.6	30.1	32.2	32.8
Totals	100	100.1	100.1	100	100.2

<sup>\*</sup> All States data from SPP/APR 2007 and 2008 Indicator Analyses from the TA&D Network

In comparing outcomes across the category areas (for example 2008 category c for social [3.9%], knowledge [19.5%] and meet needs [5.9%]), Louisiana's data is inconsistent when compared to summary data from all states as presented in the *State Performance Plan/Annual Performance Report Indicator Analyses* for FFY 2007 and FFY 2008 (for example 2008 category b for social [16.6%] knowledge [17.8%] and meet needs [16.6%]). The columns All 2007 and All 2008 above show percentages in each progress category by outcome area. Data presented for all states was more consistent across years, outcome areas, category areas than the data from EarlySteps. Louisiana recognizes that its procedure for using the child standard scores at entry and exit has probably contributed to these discrepancies.

#### **FFY 2008 Summary Statements Results**

	Summary Statements	% of children
	Outcome A: Positive social-emotional skills (including social relation	ships)
1.	Of those children who entered or exited the program below age expectations in Outcome A, the percent who substantially increased their rate of growth by the time they turned 3 years of age or exited the program	20.1%
2.	The percent of children who were functioning within age expectations in Outcome A by the time they turned 3 years of age or exited the program	32.4%

Summary Statements	% of children
Outcome B: Acquisition and use of knowledge and skills (including language/communication and early literacy)	g early
1 Of those children who entered or exited the program below age expectations in Outcome B, the percent who substantially increased their rate of growth by the time they turned 3 years of age or exited the program	42.6%
The percent of children who were functioning within age expectations in Outcome B by the time they turned 3 years of age or exited the program	28.9%
Summary Statements	% of children
Outcome C: Use of appropriate behaviors to meet their needs	3
Of those children who entered or exited the program below age expectations in Outcome C, the percent who substantially increased their rate of growth by the time they turned 3 years of age or exited the program	29.1%
The percent of children who were functioning within age expectations in Outcome C by the time they turned 3 years of age or exited the program	45.7%

Analyzing summary statement results across years and combined years results in a similar observation for outcome results applied to the summary statements analyses as shown below. The summary statements were also calculated from the data from all states from the SPP/APR Indicator Analyses from the TA&D Network. Louisiana's data is different from other states combined data.

	FFY	FFY		All	All
Outcome	2007	2008	Both	2007*	2008*
Social	%	%	%		
Sum St 1	27.8	20.1	22.1	64.8	62.6
Sum St 2	29.2	32.4	31.5	58.4	60.7
Know					
Sum St 1	26.2	42.6	39	68.8	67.4
Sum St 2	36.5	28.9	31	52.8	55
Needs					
Sum St 1	31	29.1	29.7	67.4	68.9
Sum St 2	30.2	45.7	41.5	61.4	61.9

<sup>\*</sup>Percentages were used from all states 2007 and 2008 from the SPP/APR Indicator Analyses from

### Measurable and Rigorous Target:

Targets for Infants and Toddlers Exiting in FFY 2009 (2009-10) and FFY 2010 (2010-2011) and Reported in Feb 2011 and Feb 2012

	Summary Statements	Targets for FFY 2009 (% of children)	Targets for FFY 2010 (% of children)
Outcome A: Positive social-emotional skills (including social relationships)			
1.	Of those children who entered or exited the program below age expectations in Outcome A, the percent who substantially increased their rate of growth by the time they turned 3 years of age or exited the program	20.5%	21.5%
2.	The percent of children who were functioning within age expectations in Outcome A by the time they turned 3 years of age or exited the program	32.9%	33.9%
Outcome B: Acquisition and use of knowledge and skills (including early language/communication and early literacy)			
1	Of those children who entered or exited the program below age expectations in Outcome B, the percent who substantially increased their rate of growth by the time they turned 3 years of age or exited the program	43.1%	44.1%
2.	The percent of children who were functioning within age expectations in Outcome B by the time they turned 3 years of age or exited the program	29.4%	30.4%
Outcome C: Use of appropriate behaviors to meet their needs			
1	Of those children who entered or exited the program below age expectations in Outcome C, the percent who substantially increased their rate of growth by the time they turned 3 years of age or exited the program	29.6%	30.6%
2.	The percent of children who were functioning within age expectations in Outcome C by the time they turned 3 years of age or exited the program	46.2%	47.2%

#### **Discussion: Setting Baseline and Targets**

In order to establish baseline data and set targets the following procedures and technical assistance resources have been used:

- Participating in ECO-Center Outcomes conferences and TA calls
- Participating in TA calls sponsored by OSEP and NECTAC including calls with other states using the BDI-2 as the tool for child outcomes data collection.
- Reviewing materials from websites including other states' SPP/APR's
- Requesting stakeholder participation from the Louisiana ICC in the form of a task force for this purpose. The task force met following the review of information distributed by the lead

## SPP Template – Part C (4)

February 1, 2010 Louisiana

agency for their consideration. At a meeting of the task force the results of previous years' data was reviewed as well as the results of State's aggregated data presented for two years in the Part C FFY 2006-7 and FFY 2007-8 *Indicator Analyses* by the TA&D Network. Acknowledging that the decision-making methodology from 2007-2008 Indicator 3 SPP yielded results which were inconsistent across years and did not compare with other states' results (as seen in the preceding table) the task force recommended the following:

- 1. calculate and compare outcome results for FFY 2007 and 2008.
- 2. apply the Summary Statement formulas to the 2007-2008 and 2008-2009 BDI-2 results using the ECO calculator
- 3. compare the results of the two years and analyze baseline data.
- 4. review the summary statement data from all states from the *Indicator Analyses* for two years and consider these results in setting targets.

The task force and lead agency recognize that the process being utilized by Louisiana and resulting in outcomes which do not compare well with other states' data may mean rethinking the process for placing children category areas. The current process assumes that changes will be evident at entry and exit, when actually using the standard score rather than item analysis does not provide sufficient change scores to reflect real child progress. The State has considered using processes that other states that are reporting outcomes with the BDI-2 are using, such as item analysis using the Riverside Publishing Data Manager. If the process changes in the future, baseline and target data would have to be re-established. For this reason, the State's targets for the next two years are conservative estimates of change.

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### Improvement Activities/Timelines/Resources

Improvement Activities-Indicator 3	Timelines/Resources	Discussion
Implement use of AEPSi or another method to collect outcomes data.	July 2007-through June, 2008 State Office	
Utilize the BDI-2 as the sole tool for entry and exit data collection for child outcome reporting effective July, 2007: update provider matrix to include evaluation and assessment providers who have completed BDI-2 training Collect scores of all children at entry into EarlySteps utilizing BDI-2 for updated baseline data through June, 2008 and compare to exit data available for all children who have been in the program for at least 6 months. develop process to collect and analyze new baseline data for FFY 2007 in APR due February, 2010	Riverside Publishing  Ongoing	256 BDI-2 assessments conducted during reporting period for eligibility determination and outcome measurement.  Covansys Corp completed the update of provider matrix to include designation of providers with credential to conduct evaluation and assessment in EarlySteps based upon licensure/certification and training in BDI-2 task force of the ICC was formed to assist the lead agency in developing a process for and setting baseline data and targets for outcomes
Revise data system to collect information from AEPSi or another method.  Hire EarlySteps central office staff with skills to develop data collection and reporting process	Summer 2007 through Summer 2009 State Office	Due to hiring freezes imposed by the Governor, this position was not filled. OCDD has hired a data analyst and that person will be available to assist in the development of this process.
Conduct AEPS "Train the Trainer" Workshops.	Summer 2007 through Summer 2011 and as	

Part C State Performance Plan for 2005-2010 (OMB NO: 1820-0578 / Expiration Date: 11/30/2012)

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Improvement Activities-Indicator 3	Timelines/Resources	Discussion		
Trainers recommended through Brooks Publishing will be used for this training. Brooks is the publisher for AEPS.  Continue BDI-2 training opportunities to expand number of trained providers available to administer test as well as reporting results to the Riverside web reporting system.	necessary to maintain sufficient provider availability  EarlySteps central office and CSPD  Riverside Publishing	Processing of a contract to provide additional BDI-2 training was delayed. This activity began implemented in Summer, 2009 with 4 trainings planned.		
Provide 2 day mandatory statewide trainings for all EarlySteps providers on the full AEPS and entering of data correctly. Trainers recommended through Brooks Publishing will be used for this training. Brooks is the publisher for AEPS. A total of 8 trainings will be held statewide during Spring/Summer 2007.	Spring/Summer 2007 and ongoing State Office Riverside Publishing			
Continue BDI-2 training opportunities to expand number of trained providers available to administer test as well as reporting results to the Riverside web reporting system.		As above		
Provide statewide trainings to all providers if a method other than AEPS is used for outcomes measurement.	July , 2007 through June 2008 State/Regional Staff/CSPD	As above		
Collect and analyze entry and exit data using the BDI-2 and add to AEPS entry and exit data to develop process to determine comparability of scores for the two tools for the current cohorts as well as new entries with BDI-2. Exit data will be collected using the BDI-2 for some children for whom their entry data was		Exit data was collected using the BDI-2 after July, 2007 with statewide use of this tool for all reporting as of the 2007-2008 APR reporting period.		

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Improvement Activities-Indicator 3	Timelines/Resources	Discussion
collected using the AEPS-RV.		
Provide statewide training and technical assistance to all providers on OSEP child outcome requirements. This training will be initiated during the AEPS or other assessment method trainings and ongoing through technical assistance provided by Regional Coordinators.  Analyze BDI-2 entry and exit data using above procedure for progress reporting and considerations in establishing targets in 2008-2009. Consider including current AEPS-RV entry and exit data collected to date.	Spring 2007 and ongoing through June, 2011 State/Regional Office CSPD	Entry and exit data with the BDI-2 is being used for reporting purposes.
Develop quality assurance procedures to monitor outcome testing procedures and accuracy/ completeness of outcomes data entered into AEPSi or other method data system.	Spring 2008 and ongoing through June, 2011  QAS  Regional Staff	
Develop and implement QAS procedures to monitor outcome testing procedures for accuracy/completeness of outcomes data entered using the BDI-2.		EarlySteps is participating in a TA project with DAC and SERRC on data quality and the QAS process. This activity will be a target for that project in 2009

# February 1, 2010 Louisiana

Improvement Activities-Indicator 3	Timelines/Resources	Discussion
Additional Improvement Strategies: 2008-2009	July, 2008 through June, 2011	As above
Standardize an accurate data collection, review, reporting process in QA system for regular data collection and monitoring  Participate with Lousiana ICC workgroup in development of targets for February, 2010 APR  Increase reimbursement for exit assessments from \$50 to \$100 due to number of missing exit assessments in the data set.		An SICC task force met to discuss the process for setting baselines and targets. As the need to change the process is considered, the task force will be consulted.  The rate adjustment went into effect on 9/1/2008
Work with COS's and other family members to develop PR materials and scripts for staff to use in discussing the importance of outcomes data collection		Samples of brochures and documents from other states have been shared with the ICC public relations committee for use in developing materials. This activity will be completed by June, 2010.

Part C State Performance Plan for 2005-2010 (OMB NO: 1820-0578 / Expiration Date: 11/30/2012)

### Part C State Annual Performance Report (APR) for FFY 2008-2009

### Overview of the Annual Performance Report Development - Indicator 4:

During 2005-2006, the Louisiana Outcomes Task Force convened to review information and research provided by OSEP and the National Early Childhood Outcomes (ECO) Center and the National Center for Special Education Accountability Monitoring (NCSEAM) to assist in defining methodology and data collection processes to respond to indicators 3 and 4. The SPP committee members established measurable and rigorous targets by which these indicators would be assessed and also recommended improvement activities, timelines and resources for each of the indicators. The NCSEAM survey was used for the 2005-2006 baseline data. For FFY 2006, 2007, and 2008 the Early Childhood Outcomes Center Family Outcomes Survey was selected.

Development of activities for Indicator 4 was accomplished through:

- Continuing use of the Early Childhood Outcome Center, Family Outcomes Survey (Part C version) to complete data collection for this reporting period.
- Written survey conducted with families participating in a consumer survey conducted by a contractor for OCDD for all families in the Developmental Disability service system and through written surveys for all families whose children exited EarlySteps in April, May and June, 2009
- Selection of criteria for determining that early interventions services helped a family, according to the survey which is based on a scale of 1 to 7, as response of 5 or better.
- Respond to OSEP request in FFY 2007 APR Response Table for additional information for Indicator 4.

### Monitoring Priority: Early Intervention Services In Natural Environments

**Indicator 4:** Percent of families participating in Part C who report that early intervention services have helped the family:

- A. Know their rights;
- B. Effectively communicate their children's needs; and
- C. Help their children develop and learn. (20 U.S.C. 1416(a)(3)(A) and 1442)

#### **Measurement:**

- A. Percent = [(# of respondent families participating in Part C who report that early intervention services have helped the family know their rights) divided by the (# of respondent families participating in Part C)] times 100.
- B. Percent = [(# of respondent families participating in Part C who report that early intervention services have helped the family effectively communicate their children's needs) divided by the (# of respondent families participating in Part C)] times 100.
- C. Percent = [(# of respondent families participating in Part C who report that early intervention services have helped the family help their children develop and learn) divided by the (# of respondent families participating in Part C)] times 100.

FFY	Measurable and Rigorous Target
2008-2009	Families participating in Part C report that early intervention services have helped the family:

A.	Know their rights: 76%
В.	Effectively communicate their children's needs: 74%
C.	Help their children develop and learn: 88%

#### **Data Source and Measurement Considerations:**

The Family Outcomes Survey, Part C version was utilized to collect information for Indicator 4 for this reporting period. The survey was developed by Don Bailey, Kathy Hebbler and Mary Beth Bruder of the Early Childhood Outcomes (ECO) Center with support from the Office of Special Education Programs, US Department of Education. A copy of the tool was included as Attachment 1 in the FFY 2006 APR.

### Methodology:

Data for Indicator 4 was collected through two procedures in FFY 2008. The changes in the data collection process resulted from the low number of completed surveys (142 of 868 possible surveys representing 16% of those targeted) received in 2007-2008. Therefore, another procedure was developed for collecting survey information from families in 2008 and is ongoing. EarlySteps families participate with OCDD in consumer surveys conducted by a contractor for this reporting period in four aspects of the National Core Indicators project for 2009. The Consumer Surveys (interviews) were conducted for adults across the various service areas. Three mail-out surveys (Children/Family, Adult/Family and Family/Guardian) were mailed to a total of 1500 consumers. The questions from the Family Outcomes Survey were incorporated into the survey for the EarlySteps families who were sampled. The following describes the approved sampling process for the families in the OCDD survey:

The database for Early Steps included 3787 children of current eligible age for services. The sample was a proportionate combination across the regions. A total of 858 surveys were to be mailed out to this group of clients. A matrix (below) of eligible participants by region for the types of supports/services was prepared and a representative sample size was determined by region for the final respondent sample. Minimum sample sizes were determined within each categorical cell. Due to insufficient contact information and a need to maintain a statewide distribution for each category and each region, precise proportionality could not be maintained across all matrix cells. In the case of EarlySteps, the sample size resulted in a simple percentage of total - Region 1 (203 of 3787=5.36% X 858=46) and Region 3 (640 or 3787=16.9% X 858=145). Because of the distribution of services in some regions, we had to adjust the Early Steps number by just a few clients in most regions. However, the Early Steps participants represented 57.2% (856) of the total survey (1500 total for all OCDD services) distribution, an excess of their actual representation within the original sample. Although OCDD attempted to select representative samples of people to whom family surveys were mailed, people selfselected to participate and this has an unknown effect upon results.

#### Summary of Population as Provided by Available Databases: EarlySteps Children (as of 4/01-09 for Survey Sample)

Service	Region 1	Region 2	Region 3	Region 4	Region 5	Region 6	Region 7	Region 8	Region 9	State Totals
Early Steps	484	353	640	643	172	193	402	406	494	3787
Sample	107	84	145	161	40	41	83	89	108	858

The table which follows compares the distribution of race, ethnicity and gender of all survey respondents of which the EarlySteps participants represented approximately 20% of the total for the family survey.

Race	Response Distribution	OSEP Table1 Child Count Data
Asian	1%	1%
Black/African American	31%	41%
White	52%	51%
Hispanic	0	3%
Gender		
Male	65%	61%
Female	35%	38%

Responses were obtained for 127 EarlySteps families or 3% of the EarlySteps population. Therefore, a second strategy was again utilized to increase the number of responses: All families, whose children exited the system in April, May and June, 2009, were sent surveys. An additional 104 surveys were received or 24% of the total who exited in those months. The surveys were mailed and coded only to identify the region of the respondent. No other demographic information was collected on these surveys. The regional distribution of the total EarlySteps population is compared with the regional distribution of the respondents. The distributions are similar with the exception of region 6 which was underrepresented and regions 3 and 8 which are over-represented:

Region	1	2	3	4	5	6	7	8	9	Total
EarlySteps	13%	9%	12%	17%	5%	14%	13%	7%	11%	99%
Total										
Survey	13%	9%	17%	16%	5%	5%	11%	11%	13%	100%
Respond.										

Therefore, for FFY 2008 both a sampling process (first strategy used) and a census process (second strategy used) were utilized for obtaining results for Indicator 4.

The *Family Outcomes Survey* has a response category that ranges from 1 to 7. EarlySteps considers a response of 5 or better as the criteria for determining if early intervention services "helped their family."

#### **Targets, Actual Target Data and Revisions**

Percent of Families participating in Part C who report that early intervention services have helped the family:

### A. Know their rights

EarlySteps selected questions 6 and 16 from the survey to obtain results for this area. The items were:

#6 Families of children with special needs have rights, including what to do if you are not satisfied. How is your family with your rights?

#16 To what extent has early intervention helped your family know and understand your rights?

# Responding 5 or better	Total possible-both	Percent
	questions	
212	272	78%

### B. Effectively communicate their child's needs

EarlySteps selected question 17 from the survey to address this area.

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#17. To what extent has early intervention helped your family effectively communicate your child's needs?

# Responding 5 or better	Total Possible	Percent
190	214	89%

#### C. Help their child develop and learn?

Early Steps selected questions 7 and 18 to address this area.

#7. Families help their children develop and learn. How much does your family know about how to help your child develop and learn?

#18. To what extent has early intervention helped your family be able to help your child develop and learn?

# Responding 5 or better	Total Possible	Percent
269	296	91%

### Actual Target Data for FFY 2006-2007:

	Baseline 2005-6	Target 2006-	Actual 2006-7	Target 2007-	Actual 2007-2008	Target 2008-	Actual 2008-09
A. Know	73%	74%	78%	75%	64%	76%	78%
their rights							
B.	71%	72%	84%	73%	80%	74%	89%
Communicate							
needs							
C. Help child	85%	86%	81%	87%	85%	88%	91%
develop and							
learn							
Raw	<u>112</u>		<u>83</u>		_142responses		<u>231</u>
Data=Number	surveys		responses		868 possible=		responses
of surveys	returned		346		16% return		1287
	est. 600		possible=				possible=18%
	possible		23%				return
			return				ļ

# Discussion of Improvement Activities Completed <u>and</u> Explanation of Progress or Slippage that occurred for FFY 2008-2009:

Results of family surveys used to address this indicator indicate that EarlySteps met its target for all three indicator areas. The Lead Agency will continue address performance by providing education and training opportunities to providers and families through its training modules now in development. Also, the Lead Agency will provide training opportunities to service providers, regarding their role with families to enhance the family's ability to help their child develop and learn. The table which follows details additional improvement activities.

### **Technical Assistance Resources used:**

 Materials and resources from the ECO Outcomes Conference in 2007, 2008 and 2009. Including the change to use of the Family Outcomes Survey in 2007

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- Louisiana ICC Strategic Planning workgroup for input on increasing participation of families at all levels of the EarlySteps system. This resulted in improvement strategies for the 2008-2009 Action Plan that follow.
- ECO Center Document: A Guide to Analyzing Data from the Family Outcomes Survey by Melissa Raspa, Kathleen Hebbeler, and Don Bailey (August, 2009). Use of the recommendations in this document is being considered for FY 2009-10
- SERRC/DAC Data Quality project—for this project, the staff and stakeholders participating in the
  project requested that additional information be collected from families regarding the quality of
  their experiences in EarlySteps. Additional survey questions have been drafted and will be added
  to the survey for next year. They will be submitted to the ECO Center for their consideration.

### Additional Indicator 4 data request/clarification from the OSEP FFY 2007 APR Response Table

In the APR Response Table, OSEP indicated that it "if the State intends to collect data for this indicator through sampling, it must submit its sampling methodology for this indicator as soon as possible in order to ensure that OSEP will be able to determine if its FFY 2008 data are valid and reliable.

Louisiana used both sampling and census data for data collection for Indicator 4. For its census data, 429 surveys were sent out to *all* families who had a child exiting EarlySteps in April, May, and June, 2009. Sampling was used also to obtain part of the data through the survey process described above. The sampling plan was submitted to OSEP in October 2009 and approved.

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Improvement Activities – Indicator 4	Timelines	Resources	Discussion and Revisions with Justification 2009-2010 Improvement Activities
Provide education and training to families on a variety of Early Intervention topics such as but not limited to Procedural Safeguards & Family Rights, Transition, & Best Practices Guidelines.	Spring 2007 and ongoing through 2011	COS, the PTI, DOE	The COS's developed a training module for new parents in EarlySteps to serve as "orientation to the system." Orientation activities are scheduled monthly in each region. The COS's also developed a presentation called "Getting the most from your EarlySteps Experience" which will be posted to the Parent Page of the website.
Conduct phone interviews and written surveys families on the quality of their early intervention services through the monitoring process.	Fall 2006 and ongoing through 2011	Quality Assurance Specialist	Quality Assurance Specialists have been added to the EarlySteps regional offices/districts/authorities. Timelines have been adjusted due to state hiring freezes and delays in hiring staff. Currently 2 positions are vacant.  OCDD has implemented a Quality Process for all agency providers. Part of the process requires the development of a quality enhancement plan. Some agencies have targeted activities related to this indicator based on state and regional performance in 2008-2009.
Conduct phone interviews of families on the quality of their Early Intervention services utilizing the NCSEAM Family Survey to collect information on their satisfaction of early intervention services. This item was revised as below.	Fall 2006 and ongoing through 2011	COS, OCDD Consultant	The Family Outcomes survey is now being used and the process revised as below.
Participation in the OCDD family/consumer survey process using revised procedures to sample and increase the number of survey respondents			Continued participation in OCDD consumer survey with revised strategies to increase participation. Sampling plan submitted to OSEP in 2009.  The sampling process for 2010 has been developed and will be submitted to OSEP for approval.
Develop family survey to be distributed at different phases of Early Steps Services	Summer 2007 and ongoing through 2011	Statewide Parent Consultant, COS, Regional Coordinators, Lead Agency	EarlySteps intends to post the survey to the parent page of the website for families to complete and send in at will.

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Improvement Activities – Indicator 4	Timelines	Resources	Discussion and Revisions with Justification 2009-2010 Improvement Activities
Provide technical assistance (TA) and training to FSC's, SPOE's and evaluation providers on family-directed assessments. The TA and training will include: interviewing skills, understanding and explaining the evaluation and assessment process, cultural sensitivity, procedural safeguards & family rights.	Fall 2007 and ongoing through 2011	CSPD, Regional Coordinators, Statewide Parent Consultant, COS, Lead Agency, training consultant	See discussion below regarding new, completed training modules.
The 3 current training modules (Orientation to EarlySteps, Evaluation and Assessment, and Child Development are now required for all providers. Development of 3 additional training modules will begin in 2009, due to lengthy delays in the contract approval process for their development. Modules will address IFSP, team process and family-centered services. Content of these modules includes activities that will assist in improving family outcomes.	Spring, 2009 and ongoing through 2011	Contractor, Training coordinator, regional staff and COS's	A contract was awarded in 2009 to develop the next 3 training modules: <i>IFSP, Teaming</i> , and <i>Family-Centered Services</i> . In addition, the 3 original modules described have been updated to reflect changes to EarlySteps since OCDD became the administrative office. These six modules will be web-based and required for all providers. In addition, face to face training on Teaming is required and is being offered during 2009-2010.
Provide training opportunities to families by means of posted information on early Steps website on the following topics: child development, procedural safeguards & family rights, IFSP, transition, and the importance of family surveys.	Summer 2009 and ongoing through 2011	Statewide Parent Consultant, COS, State Office, CSPD	Development of the parent page on the EarlySteps website is ongoing. The revised practice manual is posted to the website and incorporates revisions to the family section including parent's rights, and a teaming process developed by the service delivery committee of the SICC. The final revisions to the Practice Manual are planned for March 2010.

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Improvement Activities – Indicator 4	Timelines	Resources	Discussion and Revisions with Justification 2009-2010 Improvement Activities
With the move of EarlySteps to OCDD, the website was revised. A committee of COS's, the statewide parent consultant and the central office training coordinator have activities underway to revise the website Parent page to incorporate this information in the form of a parent handbook. The handbook will also be contained in the revised practice manual.	2007 and ongoing through 2011	COS, OCDD central office, State Parent Consultant.	See above
Produce Early Steps material and documents in the languages other than English. A committee will be formed to establish the resources needed	Winter 2009 and ongoing through 2011	Stakeholders, Regional Coordinators, COS, Statewide Parent Consultant, State Office	A committee began meeting in March 2009 to address shortages in interpreter services statewide following a complaint about interpreter availability. 22 additional foreign language interpreters are now available. A contract is in development to translate updated documents and will be completed in 2010.

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Improvement Activities – Indicator 4	Timelines	Resources	Discussion and Revisions with Justification 2009-2010 Improvement Activities
Incorporate family perspectives in all aspects of	July, 2008	Statewide Parent	The COS's and state Parent Liaison participate with
the EarlySteps system by providing "One	through	Consultant, COS,	regional and central office staff in all activities
Consistent Message" about EarlySteps. This will	June, 2011	Training Coordinator,	planned for the fiscal year:
be accomplished through:		SICC CSPD	
1. Development of a new CSPD plan with the		committee	1.the new CSPD plan was drafted and approved in
SICC			August, 2010. The SICC recommended and
			EarlySteps agreed to involve the regional COS's in training activities with new providers, especially
			FSC's
Develop consistent training content and			2. the COS's, Parent Liaison, and central office staff
activities for the regional COS staff			developed a Parent Orientation Presentation and will
			be conducting orientation activities with new families
			each month in 2009-2010
3. work with the Families Helping Families			3. The Families Helping Families agencies have
agencies to incorporate advocacy and resource			been coordinating COS training activities
training in COS interactions with families			A power point presentation and face-to-face
4. develop a video for each family who enters			orientation are currently being used.
the system.			F. The femily contract has been drofted and is
5. develop "family contract" component to the Parents Right's Document.			5. The family contract has been drafted and is under review.
6. develop three additional core-content training			6. The modules will be available through web-
m odules and award contract for web-hosting for			hosting in 2009-2010
all 9 modules			1105(111)9 111 2009-2010
7. Include family comments about their			7. Comments from the surveys will be posted in
experiences in EarlySteps from the Family			2009-2010
Outcome Survey on the EarlySteps website			
8. Include use of the Spanish version of the			8. The Spanish version of the survey is available
survey			from the ECO center.

### Part C State Annual Performance Report (APR) for FFY 2008-2009

### Overview of the Annual Performance Report Development - Indicator 5:

Development of Activities for Indicator 5:

- Discussions during FFY 2005 with the eligibility workgroup of the SICC to revise the eligibility criteria again with July 1, 2007 implementation following approval of FFY 2007 Federal Part C application.
- Change to a **Moderate** eligibility criteria beginning July 1, 2007.
- Monthly EIDS review of numbers of eligible children

### Monitoring Priority: Effective General Supervision Part C / Child Find

**Indicator 5:** Percent of infants and toddlers birth to 1 with IFSPs compared to:

- A. Other States with similar eligibility definitions; and
- B. National data.

(20 U.S.C. 1416(a)(3)(B) and 1442)

Measurement: Revised 4/2010

Percent=[(# of infants and toddlers birth to 1 with IFSP's) divided by the (population of infants and toddlers birth to 1)] times 100 compared to national data.

FFY	Measurable and Rigorous Target
2008-2009	1.30% of infants and toddlers birth to one will have IFSP's

#### **Data Source and Measurement Considerations**

OSEP Table 1 Report of Children Receiving Early Intervention Services, December 1, 2008 child count data was utilized for this indicator as well as Table C-13: Percent of infants and toddlers receiving early intervention services under IDEA, Part C, by age and state: Fall 2008. Discussion and charts which follow utilize the **Moderate** eligibility category ranking for comparisons based on the July 1, 2007 revised eligibility definitions of developmental delay, established medical conditions, and informed clinical opinion. Data for Table 1 reporting is derived from EIDS data and is valid and reliable.

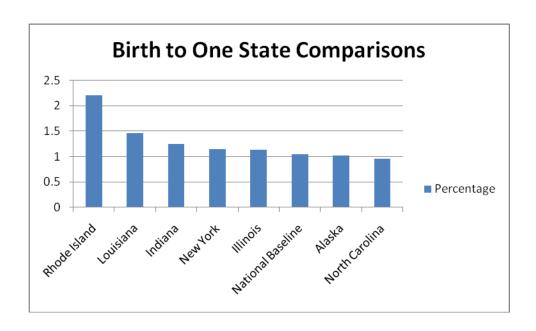
#### Actual Target Data for FFY 2008-2009:

Louisiana exceeded its target of 1.35% with identification of 1.46% of the 0-1 population in the State

	2004-2005	2005-2006	2006-2007	2007-2008	2008-2009	2009-2010
	Baseline					
Target	1.61%	1.61%	1.25%	1.30%	1.35%	1.40%
Actual	1.79%	1.76%	.85%	1.27%	1.46%	
Similar States	.49 to 6.86%	0.39% to	.45 to 1.96%	0.62-2.29%	0.55-2.20%	
		5.44%				
National	.95%	1.24%	1.06%	1.01%	1.04%	
Baseline						
Eligibility	Broad	Broad	Narrow	Moderate	Moderate	Moderate
Category						
Total	1110	1208	517	780	935	997
Children:	12/1/2004 child	12/1/2005 child	12/1/2006 child	12/1/2007 child	12/1/2008	12/1/2009
Birth – 1yr	count	count	count	count	child count	child count

#### **Explanation of Progress**

Louisiana has had 3 eligibility criteria since 2004. Changes in identification numbers in each fiscal year are reflected in these changes over the years. Since the July, 2007 change to a moderate criteria, the State has increased the number of children identified birth to one year of age from 780 to 997. Louisiana's outreach efforts to primary referral services have assisted in the growth in referrals as well: physicians and hospitals make up the 2<sup>nd</sup> and 3<sup>rd</sup> highest numbers of referrals (after families). EarlySteps has consistent referrals from hospitals NICU's who discharge preterm infants; prematurity is one of the established medical conditions for eligibility. In addition, infants with confirmed prenatal substance exposure are referred. A chart follows that shows Louisiana's child count compared to other states with a moderate eligibility criteria and the national average. Louisiana has the second highest percentage of identified birth to one year olds among States in the moderate eligibility criteria. Improvement activities are detailed in the tables that follow.



### February 1, 2010 Louisiana

Discussion of Improvement Activities Completed <u>and</u> Explanation of Progress that occurred for 2008-2009 and Revisions, <u>with Justification</u>, to Proposed Targets / Improvement Activities / Timelines / Resources for 2009-2010:

Louisiana exceeded its target for 2008-2009. Improvement Activities below are updated, but no revisions or additions are proposed.

SPP 2005-2010 Improvement Activities Indicator 5	Timelines	Discussion/Progress/Slippage
Updating all PR materials to reflect the most current information The revisions to the PR materials will begin in Spring, 2009	1 <sup>st</sup> update Winter 2006 and Ongoing through 2011	With the transition of EarlySteps to OCDD, the EarlySteps website and practice manual were revised to reflect eligibility criteria changes, effective July, 2007. The implementation of family cost participation has been postponed.
		A marketing class at the University of Louisiana at Lafayette offered to take the current EarlySteps PR materials and recommend revisions as a class project. The materials will be presented in December, 2009. Recommendations will be considered by the SICC public relations committee and central office and the materials will be updated by June, 2010
Updating the website with current information.	Ongoing through 2011	The website was relocated with the transition of EarlySteps to OCDD. The address is: <a href="http://www.earlysteps.dhh.louisiana.gov">http://www.earlysteps.dhh.louisiana.gov</a> Content is frequently updated to keep stakeholders up-
Develop scripts for presentations targeting physicians/NICU units, families and general referral sources.	Summer 2006 and Ongoing through 2011	to-date with program changes.  This improvement activity was identified in order to achieve consistency across the state with regards to information presented to the public. Two scripts were developed. One script targeted healthcare professionals and the other script targeted general referral sources, such as parents and child care programs. From these scripts, two power points were developed in order to present this information visually to potential referral sources. Although this task was targeted to be completed in the summer of 2006, the scripts were completed and distributed in February of 2006. Copies of the power point presentation were

# February 1, 2010 Louisiana

SPP 2005-2010 Improvement Activities Indicator 5	Timelines	Discussion/Progress/Slippage
		submitted with a survey being conducted by the American Academy of Pediatrics in a December, 2008 survey.
Develop outreach packets targeting physicians/NICU units, families and general referral sources.	Summer 2006 and Ongoing through 2011	EarlySteps staff often gives outreach packets during presentations to potential referral sources. The identification of specific items for these packets was identified as an improvement activity in order to achieve consistency throughout the state with regards to distributed information. The public relations committee of the State Interagency Coordinating Council (SICC) identified information to be included in all outreach packets. Although this task was targeted to be completed in the summer of 2006, the list of needed materials for the outreach packets was completed in February of 2006.  Update: Materials will be updated with revisions to other PR materials in 2010. An average of 15 child find activities per month are conducted by regional staff.
Beginning July, 2007 implement new eligibility criteria to a more moderate criteria.  Changing the eligibility criteria to a more moderate definition of developmental delay will allow identification of more children referred to the program as seen by the increased number of children identified in the December 1, 2007 child count follow implementation of the moderate criteria in July, 2007.	May 1, 2007 and ongoing through 2010	Activities include:Submit proposed revised eligibility to The criteria went into effect on July1, 2007. Referral rates increased and increasing numbers of children have been enrolled.  Status: complete
Work with MedImmune, Inc to distribute brochures regarding the impact of prematurity on development and health		The brochures were distributed in Spring, 2009
		EarlySteps and the LDE have been coordinating

# February 1, 2010 Louisiana

SPP 2005-2010 Improvement Activities	Timelines	Discussion/Progress/Slippage
Indicator 5		
Update PR materials to include requirements for timely services, transition at age 3 and 45 day timelines		activities through a TA project with DAC and SERRC to update the materials. Update: regional transition groups have been meeting since May, 2009 to identify and resolve local issues. PR materials will be updated to include clarification to transition provided in the 12/09 USDOE transition FAQ.

Part C Annual Performance Report for 2008-2009 (OMB NO: 1820-0578 / Expiration Date: 11/30/2012)

Monitoring Priority: EGS/Child Find-Indicator 5 – Page 54\_\_\_

### Part C State Annual Performance Report (APR) for FFY 2008-2009

### **Overview of the Annual Performance Report Development:**

See Overview for Indicator 5 on page 43.

Monitoring Priority: Effective General Supervision Part C / Child Find

Indicator 6: Percent of infants and toddlers birth to 3 with IFSPs compared to:

- A. Other States with similar eligibility definitions; and
- B. National data.

(20 U.S.C. 1416(a)(3)(B) and 1442)

#### Measurement:

Percent = [(# of infants and toddlers birth to 3 with IFSP's) divided by the (population of infants and toddlers birth to 3)] times 100 compared to national data.

FFY	Measurable and Rigorous Target
2008-2009	2.5% of infants and toddlers birth to three will have IFSPs.

#### **Data Source and Measurement Considerations:**

See Indicator 5 for source of discussion of the data source for this indicator.

#### Actual Target Data for FFY 2008-2009:

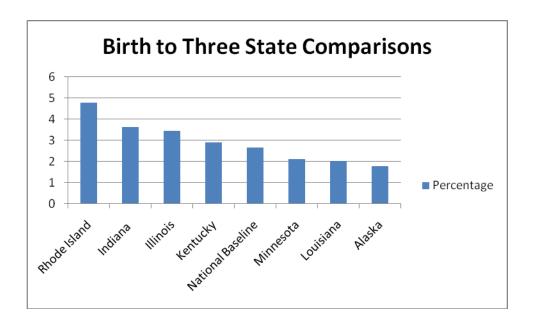
Louisiana did not meet its 2.55% target for FFY 2008, but continued performance improvement.

	2004-2005	2005-2006	2006-2007	2007-2008	2008-2009	2009-2010
	Baseline					
Target		2.4%	2.45%	2.5%	2.55%	2.6%
Actual	2.3%	1.76%	1.27%	1.78%	2.03%	
Similar States	1.28 to 7.09%	1.39% to 6.71%	1.26 to 3.41%	1.78-4.61%	1.79-4.79%	
National Average	2.2%	2.34%	2.43%	2.48%	2.66%	
Eligibility Category	Broad	Broad	Narrow	Moderate	Moderate	Moderate
Total Number of Children Served	4522	3405	2325	3155	3788	4548

### Discussion for 2008-2009 reporting period

As mentioned in the discussion for Indicator 5, the eligibility criteria changed from a narrow to more moderate category on July 1, 2007. The December, 2009 count shows a continuing increase to an

additional 760 children since 2008. The chart below shows Louisiana's percentage of children, ages birth to three compared to other states with moderate eligibility criteria.



#### **Technical Assistance Resources Used:**

- Part C SPP/APR 2008 Indicator Analyses (FFY 2007-2008): used to review other states' improvement strategies for 2008-2009 in tables that follow.
- SERRC Improvement Activities by Indicators for Part C: used to consider improvement strategies for 2008-2009 in tables that follow.

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Discussion of Improvement Activities Completed <u>and</u> Explanation of Progress that occurred for FFY 2008-2009 and revisions, <u>with Justification</u>, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2009-2010

In the SPP, the State reported 2.3% of infants ages birth to three were identified in Louisiana compared to similar states and the national average. Data captured for the 618 data for child count shows that the State did not meet its FFY 2008 target of 2.55%. The eligibility criteria were revised to a more moderate criteria beginning July 1, 2007. The 2.03% actual target data for FFY 2008 represents 17 months of implementation of this new criteria The December 1, 2009 count of 4548 representing 29 months of implementation resulted in an increase of 2223 children since December 1, 2006. Updates to improvement strategies are provided below. No new activities are proposed in 2009-2010 as most current activities are ongoing and Louisiana has continued improvement toward its target.

Improvement Activities- Indicator 6	Timelines	Discussion/Progress/Slippage
Updating all PR materials to reflect the most current information	1 <sup>st</sup> update Winter 2006 and Ongoing through 2011	The approval of the 2005 State Plan brought many changes to EarlySteps. Two of the biggest changes involved the addition of a family cost component to the EarlySteps system and changes in the eligibility criteria. Due to these changes, the public relations materials needed to be updated with the most current information. Although this task was targeted to be completed in the winter of 2006, the public relations materials were updated in May of 2006 and continue to be updated on a regular basis. Implementation of family cost participation was postponed.  A University of Louisiana at Lafayette marketing class is recommending revisions to the PR materials. They will be presented in December, 2009. The lead agency will consider their recommendations and complete the revisions by June, 2010.
Updating the website with current information.	Ongoing through 2011	The EarlySteps website was in need of updating, especially after Hurricanes Katrina and Rita. This task was accomplished through the training of two EarlySteps staff on how to post items to the website. The website has been updated and is updated now on a regular basis by EarlySteps staff members.  With the transition of EarlySteps to OCDD, the website was revised and relocated to: www.earlysteps.dhh.louisiana.gov
Develop scripts for presentations targeting	Summer 2006 and Ongoing	Another task identified as an improvement activity

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Improvement Activities- Indicator 6	Timelines	Discussion/Progress/Slippage
physicians/NICU units, families and general referral	through 2011	was the development of scripts for presentations
sources.	unough 2011	targeting physicians, NICU units, families and general referral sources. This improvement activity was identified in order to achieve consistency across the state with regards to information presented to the public. Two scripts were developed. One script targeted healthcare professionals and the other script targeted general referral sources, such as parents and daycares. From these scripts, two power points were developed in order to present this information visually to potential referral sources. Although this task was targeted to be completed in the summer of 2006, the scripts were completed and distributed in February of 2006. <b>Status: Complete</b>
Implement new eligibility criteria with more moderate criteria.	July 1, 2007	These include revised criteria for developmental delay, including the definition of informed clinical opinion and a broadened list of established medical criteria were submitted to OSEP with the May, 2007 and subsequently approved for implementation on July 1, 2007. The revised criteria were posted to the EarlySteps website, letters to providers and families were sent out, and information was distributed through the SICC and RICC activities. Status: complete
Meetings with Department of Social Services Program Manager regarding referrals and follow up for CAPTA referrals as well as a draft Interagency Agreement.	July, 2008 and ongoing through 2010	A program Manager in DSS approached EarlySteps to discuss both agencies responsibilities in meeting CAPTA requirements. A draft agreement is currently under review with completion planned in 2010.
Periodic data presentations on referrals at Bright Start, Louisiana's Early Childhood Comprehensive System (ECCS-Title V) Initiative	Ongoing through SPP period	-Bright Start meets bi-monthly and updates have been given regarding the number of DSS referrals to EarlySteps. BrightStart has been designated by Governor Jindal as the State's Early Childhood Advisory Council and the EarlySteps Coordinator is a member of the BrightStart steering committee.
Regional Coordinators participate in parish and regional meetings with Office of Community Services (child protection) staff and Early Childhood Supports and Services (ECSS) regarding referrals and follow up of CAPTA- and other-related referrals	As above	EarlySteps regional coordinators conduct training to OCS staff regarding referral and follow up. They attend periodic meetings of ECSS programs.

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Improvement Activities- Indicator 6	Timelines	Discussion/Progress/Slippage
Coordination of referrals and follow up with Early Hearing Detection and Intervention (EHDI) program in Louisiana	As above	The EarlySteps program manager met with staff of EHDI and the Department of Education Hearing Impaired preschool program to coordinate referral and service delivery efforts. A joint meeting of EHDI and the 10 regional SPOE's is planned.  Update: A joint referral agreement between EarlySteps, EHDI, and the State's LA Hear program was reached in 2009. Materials have been prepared and distributed to audiologists in the state regarding the coordination of referrals and services between EHDI and EarlySteps.
Implementation of periodic autism screening as part of the initial eligibility determination process and every 6 months thereafter for children 18 months and older. Present results of screening at autism/disability conferences, newsletters of professional organizations	July 2008 and ongoing	In conjunction with OCDD's clinical services staff, an autism screening program was implemented beginning July 1, 2008 in accordance with the recommendations of the AAP to: "Screen early, screen often."  Update: Approximately 2000 packets were received as of June 30, 2009

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### Part C State Annual Performance Report (APR) for FFY 2008-2009

### Overview of the Annual Performance Report Development - Indicator 7:

Development of Activities for implementation of Indicator 7 was accomplished through:

- Desk reviews of EIDS data report, Average Days from referral to IFSP for 1 quarter (April through June, 2009). This quarter represents an interval following 9-12 months of implementation of new SPOE contracts approved in July, 2008. One previous contract was not renewed and two new contractors took over implementation of the SPOE activities for regions 1 and 10. Implementation for the new contractors was closely reviewed by central and regional office staff during the transition.
- Determination by central and regional office staff for data collection process and timeline.
- Ongoing review by regional staff regarding 45-day timeline requirements as part of the OCDD Quality Enhancement Process and reporting.

### Monitoring Priority: Effective General Supervision Part C / Child Find

**Indicator 7:** Percent of eligible infants and toddlers with IFSPs for whom an evaluation and assessment and an initial IFSP meeting were conducted within Part C's 45-day timeline.

(20 U.S.C. 1416(a)(3)(B) and 1442

#### Measurement:

Percent = [(# of eligible infants and toddlers with IFSPs for whom an evaluation and assessment and an initial IFSP meeting was conducted within Part C's 45-day timeline) divided by the (# of infants and toddlers with IFSP's evaluated and assessed for whom an initial IFSP meeting was required to be conducted)] times 100.

Account for untimely evaluations, assessments, and initial IFSP meetings, including the reasons for delays.

FFY	Measurable and Rigorous Target
2008-2009	100% of eligible infants and toddlers with IFSPs will have an evaluation and assessment and an initial IFSP meeting conducted within Part C's 45-day timeline.

#### **Data Source and Measurement Considerations:**

The EIDS was used to collect and analyze data for Indicator 7. The 45-day timeline from referral to IFSP was analyzed for each system point of entry office in the state for the months of April through June, 2009 and includes all of the child data from that time period. A total of 1178 IFSP's were written during this quarter with 1149 meeting the 45-day timeline. These represent all geographic areas of the state.

**Actual Target Data for FFY 2008-2009:** 97.5% of eligible infants and toddlers with IFSPs had an evaluation and assessment and an initial IFSP meeting conducted within Part C's 45 day timeline. Louisiana did not meet its target of 100% but did show improvement from FFY 2006 with an increase of 1.5 percentage points.

	2004-2005 Baseline	2005-2006	2006-2007	2007-2008	2008-2009
Target	100%	100%	100%	100%	100%
Actual	90.58%	95.02%	91%	96%	97.5%
Raw Data=		<u>496</u>	602	945	<u>1149</u>
IFSPs in		522	659	989	1178
timeline					
Total IFSPs					

# Discussion of Improvement Activities Completed <u>and</u> Explanation of Progress that occurred for 2008-2009:

The 97.5% performance for FFY 2008 represents progress from the previous fiscal year. One SPOE had a finding for this reporting period. The average number of days for IFSP completion for the nine SPOE's during the period analyzed was 36.6 days. The average minimum number of days was 19 and the average maximum number of days was 47.4. One of the two agencies with previous ongoing noncompliance was not awarded a SPOE contract for the 2008-2010 contract period. One of the agencies receiving the contract has met the 100% target for the region it took over for the previous contractor and for its 3 other SPOE regions. In the October 1, 2009 report to OSEP submitted by Louisiana, it was reported that all but one of the previous findings from FFY2005 and FFY2006 were corrected. As of November 1, 2009 the remaining finding was corrected. Correction was verified following completion of corrective action through review of data reports from EIDS and review of monthly self-assessments submitted to the regional coordinator and the quality assurance coordinator.

Correction of FFY 2007 Findings of Noncompliance (if State reported less than 100% compliance): Level of compliance (actual target data) State reported for FFY 2007 for this indicator: \_\_96\_\_%

1.	Number of findings of noncompliance the State made during FFY 2007 (the period from July 1, 2007, through June 30, 2008)	3
2.	Number of FFY 2007 findings the State verified as timely corrected (corrected within one year from the date of notification to the EIS program of the finding)	2
3.	Number of FFY 2007 findings <u>not</u> verified as corrected within one year [(1) minus (2)]	1

# Correction of FFY 2007 Findings of Noncompliance Not Timely Corrected (corrected more than one year from identification of the noncompliance):

4.	Number of FFY 2007 findings not timely corrected (same as the number from (3) above)	1
5.	Number of FFY 2007 findings the State has verified as corrected beyond the one- year timeline ("subsequent correction")	1
6.	Number of FFY 2007 findings not verified as corrected [(4) minus (5)]	0

The remaining finding of noncompliance from FFY 2007 has been corrected as of December 1, 2009.

Correction of FFY 2006 Findings of Noncompliance (if State reported less than 100% compliance): Level of compliance (actual target data) State reported for FFY 2006 for this indicator: \_\_91\_\_\_%

7.	Number of findings of noncompliance the State made during FFY 2006 (the period from July 1, 2006, through June 30, 2007)	7
8.	Number of FFY 2007 findings the State verified as timely corrected (corrected within one year from the date of notification to the EIS program of the finding)	4
9.	Number of FFY 2007 findings <u>not</u> verified as corrected within one year [(1) minus (2)]	3

# Correction of FFY 2006 Findings of Noncompliance Not Timely Corrected (corrected more than one year from identification of the noncompliance):

10. Number of FFY 2007 findings not timely corrected (same as the number from (3) above)	3
11. Number of FFY 2007 findings the State has verified as corrected beyond the one-year timeline ("subsequent correction")	3
12. Number of FFY 2007 findings not verified as corrected [(4) minus (5)]	0

All previous findings from FFY 2005 and 2006 of noncompliance were corrected as of November 1, 2009.

#### **Technical Assistance Resources Used:**

- Part C SPP/APR 2008 Indicator Analyses (FFY 2007-2008): was used for other states' improvement activities: the SPOE monthly self-assessment reporting form is revised and QAS staff will review the reported data with EIDS data for verification.
- SERRC Improvement Activities by Indicators for Part C were reviewed and improvement activities for this indicator were updated and revised as seen in the charts which follow.
- Louisiana has participated in a data quality TA project with DAC and SERRC since January, 2009. An immediate outcome of this project has been shortening of timelines for correction of noncompliance following notification, verifying correction of noncompliance, and issuing correction if appropriate, so that findings are corrected timely. This improvement has assisted the State in correcting previous findings from FFY 2005, 2006 and 2007.

#### Additional Data Request/Clarification from FFY 2007 Response Table

In the FFY 2007 SPP/APR response table, OSEP requested that Louisiana:

-- "must demonstrate that the remaining two FFY 2005 and three FFY 2006 findings were corrected."

As stated above, the findings from FFY 2005 and 2006 have been corrected. Regional and central office staff conducted onsite reviews of charts, policies, and data entry to confirm that correction occurred.

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--"the State must report that it has verified that each EIS program with remaining noncompliance: (1) is correctly implementing the specific regulatory requirements: and (2) has conducted the initial evaluation, assessment, and IFSP meeting, although late, unless the child is no longer within the jurisdiction of the EIS program."

As a result of the TA project with DAC and SERRC, the state has corrected its timelines for following up with noncompliance, allowing for more timely correction and implementing the requirements in 34 CFR §303.321 (e) (2) , 303.322 (e) (1) and 303.342(a). The state conducted follow up activities in the SPOE's with remaining findings and verified that the children for whom IFSP's were late, did in fact, receive services. Louisiana has verified that SPOE's are implementing the 45-day timelines requirement and that the evaluations, assessments, and IFSP's were implemented for eligible children.

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### Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for 2008-2009:

Louisiana is not proposing revisions to the Improvement Activities which follow, as all are ongoing. Discussion of activities conducted for the fiscal year is provided. Two additional activities are added for 2009-2010

Improvement Activities-Indicator 7	Timelines	Discussion/Progress/Slippage
Issue RFP to reduce SPOE regions from 19 to 9 to improve efficiencies.  The contract award was completed in 2008. Ongoing communication, data review, and monitoring will continue throughout the 3 year contract period	October 2005 through 2011	A new RFP was issued in 2008 for the system entry process beginning July, 2008 through June, 2011. The goal was to increase the number of agencies from 9 to 10 to bring the programs in line with other OCDD regional programs, which uses 10 "regions." Ten contracts were awarded and the 10 SPOE's are operating for the 2008-2009 state fiscal year. In Region 1, the original contractor was not awarded a new 3-year contract. Instead region 1 was split into 2 regions with 2 new contractors. The referral numbers from the regions and the adherence to the 45-day timeline requirement have improved significantly and consistently over the fiscal year with these new contractors.
Conduct SPOE monitoring activities on the 45 day requirement including desk reviews, data verification conduct inquiries, issue findings if necessary and assure correction of noncompliance in accordance with federal requirements	Ongoing through 2011	The State uses its EIDS 45-day timeline report to identify each SPOE that is not at 100% compliance on this indicator. This report is run quarterly and results may trigger technical assistance. The report is reviewed with the SPOE for data verification. The regional coordinators provide ongoing technical assistance on this indicator. The SPOE personnel are aware that this timeline is a requirement of their contract and regulations. Each Intake Coordinators strives to meet this timeline. This responsibility is detailed in the Practice Manual. If the SPOE is noncompliant with this indicator, a finding is issued, corrective action plan is developed with timelines to ensure compliance within one year of identification. SPOE's will continue to monitor the 45 day timeline reporting each month and report results to the regional coordinator and QAS specialist. Use of the documentation of "exceptional family circumstances" and other reasons for untimely performance will assist in identification of problem areas for timeline delay. Regional coordinators continue to provide technical assistance when trends are identified.
Provide ongoing training and technical assistance	Ongoing through	Regional Coordinators conduct monthly reviews of SPOE self-assessments and provide technical assistance as needed. An

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Improvement Activities-Indicator 7	Timelines	Discussion/Progress/Slippage	
on SPOE data verification and the IFSP 45 day process	2011	average of 30 chart reviews per month are conducted.	
Revise Practice Manual and forms to reflect changes to State Application including eligibility and family cost participation	Spring 2006 through Summer 2009	As a result of the decrease in the number of identified children the eligibility criteria was broadened and went into effect in July, 2007	
Training will begin on the draft revisions to the practice manual for SPOE's and FSC agencies in January, 2009. The revisions will be posted to the website in 2009 as well.		Training and review of the draft practice manual was completed in Spring, 2009. Final edits are underway and will be posted to the website in Spring, 2010 with training on practice changes to follow.	
Provide technical assistance and training on revisions to the Practice Manual and forms	Spring 2006	The practice manual is being revised and updated to reflect changes to the eligibility criteria and the move to OCDD in order to establish consistent practices across systems where appropriate.	
Recruit additional evaluation and assessment providers to assist with eligibility determination and IFSP development	Spring 2006 and ongoing through 2011	Changes to the eligibility process to the use of the BDI-2. Training was provided by OPH in February/March, 2006 and June, 2007 resulting in approximately 300 trained providers for evaluation and	
Through a training contract to be developed and issued in 2009, additional BDI-2 training will be provided in Summer, 2009		assessment. Increased numbers of providers available for the eligibility determination process will facilitate timely completion of IFSP's.	
provided in Cammer, 2000		The new training contract was approved in 2009. The training schedule is developed and 4 BDI-2 trainings will be conducted by 6/30/2010 to increase the number of evaluators available for eligibility determination, annual redetermination, and child outcome assessment at exit.	
Revise EIDS to capture new data elements for eligibility and family cost participation	Spring 2006 and ongoing	The data system was revised and new fields were added to capture needed information. Louisiana plans to report delays due to	
The data system is being updated to capture and provide documentation for timelines which are exceeded due to exceptional family circumstances		exceptional family circumstances in the February 1, 2011 APR.	
Recruit and enroll additional agencies to provide Family Service Coordination and increase capacity of current agencies to meet the need for services for newly identified children and families in	July, 2007 and ongoing	During the past 2 years agencies which provide FSC have closed, ceased providing FSC for the EarlySteps population, or limited accepting new referrals. OCDD staff will recruit and assist in provider enrollment of new agencies to provide this service. Additional FSC agencies have enrolled in 2008-09 and additional enrollments are underway in 2009-2010. In addition,	

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Improvement Activities-Indicator 7	Timelines	Discussion/Progress/Slippage
EarlySteps. A goal for FSC agency availability is a minimum of 2 per region.  In 2008, the legislature appropriated additional funds for a rate increase, including FSC rates, which went into effect 9/1/08. In addition, one FSC agency closed in Region 6. Three new agencies opened. An additional agency is preparing to open in 2009 in Region 5.		OCDD successfully obtained a reinstatement of the previous rate for FSC services to increase the availability of the service by current agencies. The rate increase was approved effective September 1, 2008. For children whose service coordination is reimbursed through non-Medicaid funds, the increased rate was implemented immediately. The Centers for Medicare and Medicaid Services (CMS) has not approved the rate increase as of 12/1/2009. Upon approval the increased rate will be paid retroactively to September, 2008. However, the delay in the approval and ongoing payment at the lower rate has had a negative impact on agencies' hiring new and keeping service coordinators. There continues to be high turnover in staff, requiring ongoing training and TA by regional staff.
Addition of question on Family Outcomes survey regarding their experience with the 45-day timeline.	July, 2008 and ongoing	As part of its data quality TA project with DAC and SERRC, EarlySteps developed additional questions for families regarding the 45-day timeline. Additional information will be reported from the surveys and used for quality assurance with SPOE's.
Update PR materials to include requirement to increase public's expectation for this result	July, 2008 and ongoing	The SICC PR committee is reviewing recommendations for presenting information to the public.
Report quarterly performance of compliance at Regional ICC meetings	July, 2008 and ongoing	Regional coordinators present data on local performance at their ICC meetings.
Additional Improvement Activity for 2009-2010  Continue and expand pilot opportunities for increasing efficiency of the Evaluation and IFSP process through: joint eligibility evaluations conducted across Part C and Part B. expansion of processes in which the eligibility determination and IFSP processes combine the resources of intake and eligibility.  Improve process to issue findings and	July 2008 and ongoing.	Beginning in 2008 as part of improvement activities for Indicator 8, EarlySteps and local LEA's in 2 regions piloted a joint eligibility process for both Part C and 619. See the Indicate 8 section for discussion. In addition, to improving transition to Part B, this process has the potential to positively impact improvement for this indicator. Expansion of these activities is planned in 2009-2010  In addition, activities incorporating components of a Routines-based assessment process in one region have facilitated shorter timelines between eligibility and the development of the IFSP.
determinations annually so that process is consistent from year to year.	July 2009 and ongoing	

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### Part C State Annual Performance Report (APR) for FFY 2008-2009

### Overview of the Annual Performance Report Development - Indicator 8:

- Central Office/Regional Coordinators developed procedure for record review process: chart review of all children who exited EarlySteps in March, April, and May 2009 (census data). 3050 children exited the program in 2008-2009, 385 charts were reviewed (represents 13% of children exiting).
- Monthly report sent to Louisiana Department of Education with notification of children potentially eligible for Part B who have active IFSP's the month they reach 2 years, 2 months of age.
- Respond to OSEP request in FFY 2007 APR Response Table for Indicator 8.

#### Monitoring Priority: Effective General Supervision Part C / Effective Transition

**Indicator 8:** Percent of all children exiting Part C who received timely transition planning to support the child's transition to preschool and other appropriate community services by their third birthday including:

- A. IFSPs with transition steps and services;
- B. Notification to LEA, if child potentially eligible for Part B; and
- C. Transition conference, if child potentially eligible for Part B.

(20 U.S.C. 1416(a)(3)(B) and 1442)

#### Measurement:

- A. Percent = [(# of children exiting Part C who have an IFSP with transition steps and services) divided by the (# of children exiting Part C)] times 100.
- B. Percent = [(# of children exiting Part C and potentially eligible for Part B where notification to the LEA occurred) divided by the (# of children exiting Part C who were potentially eligible for Part B)] times 100.
- C. Percent = [(# of children exiting Part C and potentially eligible for Part B where the transition conference occurred) divided by the (# of children exiting Part C who were potentially eligible for Part B)] times 100.

Account for untimely transition conferences, including reasons for delays.

FFY	Measurable and Rigorous Target		
2008-2009	A. 100% of all children exiting EarlySteps will have an IFSP that includes transition steps and services		
	B. 100% of children exiting EarlySteps who were potentially eligible for Part B will have notification to the LEA		
	C. 100% of children exiting EarlySteps identified as potentially eligible for Part B will have a timely transition conference		

#### **Data Source and Measurement Considerations:**

Chart review was used for data collection for 8a and 8c of this indicator. EIDS was used for 8b. Reviews of Family Service Coordination agency charts were conducted for all children exiting the program in March, April and May, 2009, a total of 385 children (census data). This represents 13% of the children who exited EarlySteps in FFY 2008.

### Actual Target Data for FFY 2008-2009:

The performance summary for Louisiana for Indicator 8:

- Improved performance for 8a—Improvement to 94.5% of IFSP's with transition steps and services, did not meet target
- Maintained performance for 8b—100% of potentially eligible children reported to the LEA—met target
- Improved performance for 8c—91.4% of exiting children had transition conferences—did not meet target.

	2004-2005 Baseline	2005-2006	200	6-2007	200	7-2008	200	08-2009
Targets	100%	100%		100%		100%		100%
8a. actual	73%	86%	<u>286</u> 307	93%	<u>363</u> 388	94%	364 385	94.5%
8b. actual	76%	100%	La DOE report	100%	La DOE report	100%	La DOE report	100%
8c. actual	81%	96%	<u>261</u> 307	85%	<u>357</u> 388	92%	352 385	91.4%

Discussion of Improvement Activities Completed <u>and</u> Explanation of Progress that occurred for FFY 2008-2009 and revisions, <u>with Justification</u>, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2008-2009:

Indicator 8A: Progress that occurred for the number of IFSP's with transition steps and services occurred through technical assistance and training conducted regarding IFSP development requirements to new and existing family service coordinators. Regional coordinators reviewed IFSP's monthly for compliance as follow up to reviews conducted during 2007-2008. Results of data collected during March, April and May, 2009 indicated findings in 4 agencies. Notices of findings will be issued for this indicator and in conjunction with any findings identified from other indicators or regulatory requirements identified in onsite, cyclical monitoring. Discussion regarding ongoing findings from previous fiscal years follows below. Improvement activities are given in the charts which follow.

**Indicator 8B:** For notification to the LEA, the data source was changed in 2006 from chart review of IFSP's to a central reporting process using EIDS. This process is described in Louisiana's February, 2007 APR. In this process, a monthly data report of all active children at least age 2 years, 2 months through 3 years is sent to the Louisiana Department of Education (LDE). The appropriate LDE contact acknowledges receipt of the list. The performance for this indicator is reported as 100%, since 100% of the number of active children for the entire state for the given age is sent. The numbers sent each month vary as the ages of the children change monthly. An average of 2009 names per month were reported. Actual numbers are submitted below:

#### **Transition List Totals Per Month to LA DOE**

Month	Referrals 2008-2009	Referrals 2008-2009	Referrals 2006- 2007
July	1855	1353	1696
August	1924	1431	1471
September	1860	1415	1410
October	1922	1540	1368
November	1965	1580	1328
December	2018	1702	1398
January	1939	1721	1216
February	2010	1673	1304
March	2090	1790	1268
April	2162	1853	1362
May	2157	1874	1407
June	2210	1912	1430
Ave/Month	2009 names per month	1653 names per month	1388 per month

Upon receipt, the LDE sends an acknowledgement that the report was received, disaggregates and sends the list to the appropriate LEA. The receiving LEA staff reviews the list and contacts families to begin the eligibility determination process for Part B. Discrepancies are discussed with the FSC agency and/or Regional Coordinator. Examples of identified discrepancies include the reporting of a child of the appropriate age whose case was closed when the notification was sent or an incorrect address or contact phone number by which to reach the family. In addition, the LDE staff compares the lists with their data system to monitor timely completion of IEP's by the third birthday. Discrepancies for timely IEP's are reported by memo from LDE to the superintendent of each LEA with copies to the appropriate regional coordinator. The LDE also holds biannual meetings of LEA staff, regional preschool coordinators, regional EarlySteps coordinators, and central office representatives to report on progress for timely transition activities for both Part C and Part B.

**Indicator 8C:** Louisiana had slight regression of .6 of a percentage point. Using the chart review process described above for 2008-2009 APR data collection, 6 agencies had findings for transition conferences for children potentially eligible for Part B. Notice of findings are subsequently issued and corrective action developed so that timely correction can occur.

Although, Louisiana did not meet its targets of 100% for 8a and 8c, improvement was shown in 8a and very slight regression for 8c. Provider capacity is an ongoing issue for family support coordination. Service coordinators carry high caseloads (up to 50 children) to serve the increased number of eligible children. SPOE's have continued to provide ongoing service coordination in the absence of openings in service coordination agencies. Although a rate increase was approved in this reporting period, it was not implemented until September 2008. CMS has not approved the rate; therefore agencies have not realized the increase to date for Medicaid-eligible children. Upon approval, it will be retroactively paid to September, 2008. Agencies are receiving the increased reimbursement for children not Medicaid-eligible from state general fund and Part C funds. Three additional agencies were enrolled in 2008-2009 and one agency closed. Three to four additional agencies are planning to enroll in the current fiscal year. Louisiana began implementing some of the requirements of the CMS Targeted Case Management rule, including the 15 minute unit billing which also impacted availability of FSC into FFY 2008. OCDD and Medicaid have conducted a time and rate study for all targeted case management programs in the state. Parts of the results of the study indicate that agencies pay service coordinators poorly and turnover is high. FSC agencies and regional coordinators must constantly train new FSC's.

As described in Indicator 7, improvement activities to be implemented in FFY 2008 to address ongoing noncompliance include increasing the number of agencies enrolled which provide FSC

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through recruitment, improving the ability of existing agencies to accept new referrals through rate increases, and increasing training opportunities for new and existing providers to ensure compliance. Sanctions include more intense corrective action, fund recoupment, and increased onsite technical assistance.

#### Response to OSEP request from FFY 2007 Response Table – Indicator 8:

**8A:** The State must demonstrate, in the FFY 2008 APR, due February 1, 2010, that the remaining three FFY 2006 findings were corrected. The State must demonstrate, in the FFY 2008 APR, that the State is in compliance with the requirements in 34 CFR §303.148(b)(4) and 303.344(h), including correction of the noncompliance in the FFY 2007 APR.

Regarding correction of noncompliance from FFY 2006, there were 10 agencies with findings in FFY 2006; 7 findings had timely correction, three did not. In the October 1, 2009 report to OSEP, Louisiana reported that it hoped to correct 2 of the findings. Since the report was submitted, all three of the findings from FFY 2006 have been corrected. Regional coordinators conducted chart reviews at each agency to verify correction. For 2007-2008 the state reported 9 findings for this indicator. Seven findings were corrected timely. The remaining two findings are in two agencies for which noncompliance is also ongoing for Indicator 8c. Intensive onsite follow up is underway. With the improved correction timeline which EarlySteps has implemented, correction for these two findings is anticipated by June, 2010.

In reporting on correction, the State must report, in its FFY 2008 APR due February 1, 2010, that it has verified that each EIS program with noncompliance reported by the State under this indicator in the FFY 2007 APR: (1) is correctly implementing the specific regulatory requirements; and (2) has developed an IFSP with transition steps and services, although late, unless the child is no longer within the jurisdiction of the EIS program. . .

In its efforts to correct ongoing findings from previous fiscal years, the State conducted frequent, onsite review of charts to verify that IFSP's for those children for whom the IFSP's did not meet the requirements of this regulation were revised so that timely, appropriate transition occurred. Through these review activities EarlySteps is able to establish that the FSC agencies are correctly implementing the transition requirements.

**8C:** "the State must demonstrate, in the FFY 2008 APR, due February 1, 2010, that the remaining three FFY 2006 noncompliance findings were corrected.""

Three agencies had ongoing findings as reported in the Indicator 9 worksheet in the FFY 2006 APR. As reported in the October 1, 2009 report to OSEP, upon follow up in 2008-2009, two of the agencies had correction. As of November 1, 2009 the remaining finding had correction. All three findings from 2006 have been corrected. In 2007-2008, EarlySteps identified 11 findings, 8 of those findings were corrected timely. Three agencies had ongoing findings. Those same three agencies had findings in 2008-2009. With the improved timeline process for correction which has been implemented through the TA project, the State anticipates correction for these agencies by June, 2010.

"...the State must report...that it has verified that each EIS program with remaining noncompliance: (1) is correctly implementing the specific regulatory requirements; and (2) has conducted a transition conference for each child potentially eligible for Part B, although late..."

As part of the activities associated with correction of ongoing findings, the state verified that the agencies are correctly implementing the requirements for this indicator and that transition conferences for potentially eligible children for whom noncompliance was identified occurred, although late.

'The State must review its improvement activities and revise them. . .including reporting correction of the noncompliance identified in the FFY 2006 APR."

Revised improvement activities are included in the chart below.

#### **Technical Assistance Resources Used:**

- In FFY 2008 and ongoing, EarlySteps and LDE have jointly participated in a transition TA project with NECTAC and SERRC. Beginning in the Spring, 2009, several conference calls were held with staff from all 4 agencies to review indicator performance and discuss options for improving performance in both IDEA programs. In May, 2009, two meetings were held for staff from Parts B and C to develop assess regional needs and develop regional plans to address concerns, identify resources, and meet needs. Regional workgroups are continuing to meet to address identified regional needs. In November, 2009 a follow up meeting was held to chart progress. Future meetings are planned for 2010 to review progress.
- The SERRC hosted a meeting of its states in October, 2008. Through a telephone conference
  with an OSEP representative, clarification was provided regarding late referrals to the Part C
  system. As a result, the Louisiana Part C and Section 619 coordinators revised their respective
  referral practices and updated the practice manual as follows:

For children referred to EarlySteps whose third birthdays will occur in ≤ 45 days, EarlySteps will refer the family to the LEA. The intake coordinator will assist the family with transition to OCDD services. The LEA will consider the child as a new referral. For children referred to EarlySteps whose third birthdays will occur between 45 and 90 days, EarlySteps will proceed with the eligibility process and the LEA will participate in the initial eligibility determination and IFSP, including the transition conference with the family if potentially eligible for Part B. The LEA will consider the child as a transition referral to Part B.

- OSEP FAQ on transition issued December, 2009. The State will address practices which may require revision based on the document.
- Part of the goal of the TA project with SERRC and DAC is to develop additional indicators of
  quality performance in EarlySteps. Indicators were proposed for successful transition
  experiences. As a field test, families were surveyed to obtain information related to their
  experience regarding transition. Two key questions were asked as part of the survey:
  - (1) Did EarlySteps give you enough information to participate in transition activities?
  - (2) To what extent were you involved in planning for your child's transition from EarlySteps?

The survey included families from each of the 10 OCDD regions to a total of 429 participants and 105 surveys were returned, representing 24% of those targeted. Results indicated that 86% of those who responded felt EarlySteps had provided adequate information to participate in transition and 87% felt they were actively involved in planning for their child's transition from EarlySteps. EarlySteps intends to use these results as baseline performance from which to improve results. Louisiana contacted the ECO center regarding its intention to include the questions in the *Family Outcomes Survey* in 2009-2010.

 Part C SPP/APR 2008 Indicator Analyses (FFY 2006-2007): for additional improvement strategies: develop strategies to account and report for untimely transition conferences for inclusion in focused monitoring for this Indicator and reporting for FFY 2009.

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### Improvement Activities/Timelines/Resource for 2008-2009 and Revisions for 2009-2010:

Improvement Activities-Indicator 8	Timelines	Discussion/Progress/Slippage	Revisions with Justification for 2009- 2010
Conduct SPOE/FSC monitoring activities on the transition requirement through scheduled visits, focused monitoring, compliance reviews and issue findings if necessary and assure correction of noncompliance in accordance with federal requirements	Ongoing through 2011	With the transition of EarlySteps to OCDD and the lack of QAS staff for routine onsite monitoring activities, regional coordinators conducted chart review activities through focused monitoring for data for this Indicator. As discussed with Improvement activities in earlier sections, OCDD will hire staff in its regions of the state to make more comprehensive quality enhancement services available.	
		During 2008 and 2009, hiring freezes were implemented resulting in a delay in hiring these regional staff, they were subsequently filled. However, seven of the nine regional positions are filled as of December, 2009, another hiring freeze is in effect. To implement the required activities, regional coordinators are assisting the QAC and some regional QAS staff are assisting other regions to implement the activities on the 2009-2010 quality assurance calendar.	
Revise the Transition Booklet in collaboration with DOE for families  Fall 2006 and ongoing		The Department of Education revised this document. It was reviewed by EarlySteps, has been distributed by the Department of Education, and is available to families for transition activities.  Regional coordinators continue to participate in the bi-annual LDE preschool meetings to address transition	EarlySteps, the SICC Program Components committee and the LDE 619 staff will address the implications of the OSEP transition FAQ issued in December, 2009 for compliance with its requirements. The Transition Booklet will also be reviewed to assure that it meets the FAQ requirements.

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Improvement Activities-Indicator 8	Timelines	Discussion/Progress/Slippage	Revisions with Justification for 2009- 2010
		issues. These meetings will serve as part of the process for the transition TA project with EarlySteps and LDE	
		The COS's conduct/coordinate transition training activities in conjunction with other Families Helping Families program staff.	
Provide monthly data reports for dissemination to DOE to assist in transition	Spring 2006 and ongoing through 2011	The Lead Agency provides a monthly report to the Department of Education identifying children who are potentially eligible for Part B services. Due to this ongoing report to the Department of Education EarlySteps is at 100% compliance on notification to the LEA potentially eligible children.	During 2010, EarlySteps and the LDE must address the data requirements regarding LDE indicator B-12a reporting for those children referred to Part C less than 90 days before the 3 <sup>rd</sup> birthday.
Provide technical assistance to SPOE/FSC on transition process	Ongoing through 2011	The Regional Coordinators provide ongoing technical assistance throughout the state. Service coordinators are aware that one of their primary responsibilities is to facilitate the Transition events required to support transition from Part C, ensuring families are aware of all steps and supports when the child exits from Part C.	
		In addition, SPOE and FSC staff are participating in the regional meetings for the transition TA project. The regional coordinators report progress to the central office.	
Coordinate transition activities at the state, regional and local levels with the	Summer, 2007 and ongoing	The list submitted monthly to the Louisiana Department of Education (see	

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Improvement Activities-Indicator 8	Timelines	Discussion/Progress/Slippage	Revisions with Justification for 2009- 2010
Louisiana Department of Education Preschool Program and Division of Special Populations		above) is reviewed by their staff, sorted and distributed to the appropriate local education agency to facilitate timely transition.	In Region 9 a pilot process for a joint eligibility determination process for both Part C and B was started in September, 2008. The pilot will continue and
		The EarlySteps regional coordinators participate in La. Department of Education meetings with LEA's and regional DOE preschool coordinators	possibly expand to 2 additional regions.
		The Region 4 RICC completed its own transition project resulting in the development of an individualized referral process to each of the LEA's in its region. The result of the process was a manual shared with participants which identifies the process for each LEA and shares all relevant contact information and forms. Other regions are replicating this process as part of the TA project which is ongoing.	
		The LEA-SPOE pilot projects conducting joint eligibility determination for Parts C and B were piloted in 2 LEA's in 2008-09. One LEA is continuing, one required significant revisions to its, but is continuing and at least one new LEA is piloting the process this year. Additional LEA's are discussing implementation.	
Explore the possibility of a TA activity with the Louisiana Department of Education and NECTAC on transition	Spring 2009- Spring 2010	EarlySteps and the LA DOE jointly began the TA project with NECTAC and SERRC. Two meetings in 2 separate areas of the state (4 meetings) have been held as of November, 2009. Regional teams are continuing to meet to implement action plans developed at the meeting. These target need areas	

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Improvement Activities-Indicator 8	Timelines	Discussion/Progress/Slippage	Revisions with Justification for 2009- 2010
		identified in the larger group meetings following an assessment. Additional regional meetings and statewide meetings are planned in 2010.	
Consider adding questions to the Family Outcomes Survey regarding transition	Spring 2009 and ongoing.	As part of the Data Quality TA project with DAC and SERRC, the team proposed surveying families about the quality of their transition experience. Two questions were developed and piloted in 2009. The results are presented in the preceding Indicator 8 discussion section	Include the results of the field test survey in the <i>Family Outcomes Survey</i> conducted in 2009-2010 and use preliminary data as baseline from which to improve performance.
New improvement activity for 2009-2010  EarlySteps will work with the Lousiana Dept of Education to review/revise transition activities to assure compliance with the areas addressed in OSEP's December, 2009 FAQ,	Spring, 2010 and ongoing	OSEP released the Early Childhood Transition FAQ in December, 2009. Some of the responses to the questions have implications for policy and practice for EarlySteps and for coordination of data to Part B. EarlySteps will request assistance from the Program Components Committee of the SICC and the LDE to address potential changes.	

#### Overview of the Annual Performance Report Development - Indicator 9:

Development of activities for Indicator 9 was accomplished through:

- Monitoring conducted by Quality Assurance Specialists and Regional Coordinators
- Corrective Action Plans developed by agencies and providers and technical assistance provided by regional coordinators
- Timely correction of noncompliance monitored.
- Review of FFY 2005, 2006, 2007 findings for status of correction of noncompliance for OSEP May 2009 APR Response Table.

#### Monitoring Priority: Effective General Supervision Part C / General Supervision

**Indicator 9:** General supervision system (including monitoring, complaints, hearings, etc.) identifies and corrects noncompliance as soon as possible but in no case later than one year from identification.

(20 U.S.C. 1416(a)(3)(B) and 1442)

#### Measurement:

Percent of noncompliance corrected within one year of identification:

- a. # of findings of noncompliance.
- b. # of corrections completed as soon as possible but in no case later than one year from identification.

Percent = [(b) divided by (a)] times 100.

States are required to use the "Indicator C 9 Worksheet" to report data for this indicator.

FFY	Measurable and Rigorous Target
2008-2009	100% of findings (including monitoring, complaints, hearings, etc) will be corrected as soon as possible but in no case later than one year of identification.

#### **Data Source and Measurement Considerations:**

Actual Target Data for FFY 2008-2009 derived from percent shown in the last row of the Indicator C9 Worksheet [column (b) sum divided by column (a) sum times 100]: Louisiana did not reach its target of 100% but has improved it performance by 10.5 percentage points.

	2004-2005	2005-2006	2006-2007	2007-2008	2008-2009
	Baseline				
Target	100%	100%	100%	100%	100%
Actual	95.3%	92%	81.6%	72%	82.5%
Raw Data	41 corrected timely	23 corrected timely	102 corrected timely 125 findings	31 corrected timely	33 corrected timely 40 findings
	43 findings	25 findings	:=0 :ge	43 findings	10go

The C-9 Worksheet Follows:

Indicator/Indicator Clusters	General Supervision System Components	# of EIS Programs Issued Findings in FFY 2007 (7/1/07 to 6/30/08)	(a) # of Findings of noncompliance identified in FFY 2007 (7/1/07 to 6/30/08)	(b) # of Findings of noncompliance from (a) for which correction was verified no later than one year from identification
Percent of infants and toddlers with IFSPs who receive the early intervention services on their IFSPs in a timely manner.	Monitoring Activities: Self-Assessment/ Local APR, Data Review, Desk Audit, On-Site Visits, or Other	11	11	10
	Dispute Resolution: Complaints, Hearings	4	4	4
Percent of infants and toddlers with IFSPs who primarily receive early intervention services in the home or community-based settings	Monitoring Activities: Self-Assessment/ Local APR, Data Review, Desk Audit, On-Site Visits, or Other Dispute Resolution:			
Percent of infants and toddlers with IFSPs who demonstrate improved outcomes	Complaints, Hearings  Monitoring Activities: Self-Assessment/ Local APR, Data Review, Desk Audit, On-Site Visits, or Other Dispute Resolution:			
4. Percent of families participating in Part C who report that early intervention services have helped the family	Complaints, Hearings  Monitoring Activities: Self-Assessment/ Local APR, Data Review, Desk Audit, On-Site Visits, or Other Dispute Resolution:			
5. Percent of infants and toddlers birth to 1 with IFSPs	Complaints, Hearings Monitoring Activities: Self-Assessment/ Local APR, Data Review, Desk Audit, On-Site Visits, or Other			
6. Percent of infants and toddlers birth to 3 with IFSPs	Dispute Resolution: Complaints, Hearings			
7. Percent of eligible infants and toddlers with IFSPs for whom an evaluation and assessment and an initial IFSP meeting were conducted within Part C's 45-day timeline.	Monitoring Activities: Self-Assessment/ Local APR, Data Review, Desk Audit, On-Site Visits, or Other	3	3	2
	Dispute Resolution: Complaints, Hearings	2	2	2
8. Percent of all children exiting Part C who received timely transition planning to support the child's transition to preschool and other appropriate community services by their third birthday including:	Monitoring Activities: Self-Assessment/ Local APR, Data Review, Desk Audit, On-Site Visits, or Other	9	9	7

Indicator/Indicator Clusters	General Supervision System Components	# of EIS Programs Issued Findings in FFY 2007 (7/1/07 to 6/30/08)	(a) # of Findings of noncompliance identified in FFY 2007 (7/1/07 to 6/30/08)	(b) # of Findings of noncompliance from (a) for which correction was verified no later than one year from identification
A. IFSPs with transition steps and services;	Dispute Resolution: Complaints, Hearings			
8. Percent of all children exiting Part C who received timely transition planning to support the child's transition to preschool and other appropriate community services by their third birthday including:	Monitoring Activities: Self-Assessment/ Local APR, Data Review, Desk Audit, On-Site Visits, or Other			
B. Notification to LEA, if child potentially eligible for Part B	Dispute Resolution: Complaints, Hearings			
8. Percent of all children exiting Part C who received timely transition planning to support the child's transition to preschool and other appropriate community services by their third birthday including:	Monitoring Activities: Self-Assessment/ Local APR, Data Review, Desk Audit, On-Site Visits, or Other	11	11	8
C. Transition conference, if child potentially eligible for Part B.	Dispute Resolution: Complaints, Hearings			
OTHER AREAS OF NONCOMPLIANCE:	Monitoring Activities: Self-Assessment/ Local APR, Data Review, Desk Audit, On-Site Visits, or Other Dispute Resolution: Complaints, Hearings			
OTHER AREAS OF NONCOMPLIANCE:	Monitoring Activities: Self-Assessment/ Local APR, Data Review, Desk Audit, On-Site Visits, or Other			
	Dispute Resolution: Complaints, Hearings			
Sum	40	33		
Percent of noncompliance corrected within one year of identification= Note: [column (b) sum divided by column (a) sum] times 100			0	.825

#### Describe the process for selecting EIS programs for Monitoring:

Louisiana's General Supervision System includes several components which constitute "monitoring." For 2008-2009 selection occurred as follows:

- 1. Thirty-three providers were monitored through chart review. Selection occurred through a sampling process developed by the Bureau of Health Economics in DHH. This was an activity jointly conducted with Medicaid in Fall, 2008.
- 2. All 21 FSC agencies and 10 SPOE agencies participated in focused monitoring activities for data collection for APR reporting as described in the appropriate sections.
- 3. The 10 SPOE agencies conducted monthly self-assessments and submitted reports to the Lead Agency.
- 4. All agencies and providers against whom complaints were verified participated in focused monitoring regarding the complaint.

#### **Explanation of Progress or Slippage for FFY 2008**

Louisiana did not meet its target of 100% for Indicator 9 but improved in timely correction of findings as compared to FFY 2007. Explanations for the remaining findings for the fiscal year have been discussed in the preceding sections for each indicator and result from lack of QAS staff to provide consistent, statewide follow up; reimbursement rate cuts limiting provider availability, staff turnover, and closure of agencies; and lack of ongoing training opportunities for new and ongoing staff. The major cause however was identified as part of the data quality TA project with DAC and SERRC. The consultants and staff identified a faulty follow up timeline that did not allow for correction after noncompliance was identified, within the one-year requirement. Previously, upon identification, the State would issue findings and require corrective action, but the follow up was not conducted until the same time specified on the calendar in the following fiscal year. Using this timeline, if noncompliance was identified again, the correction could not occur until the new fiscal year. The State has altered this process so that following notification of noncompliance, CAP and verification timelines are shortened so that correction can be verified as soon as possible and/or subsequently corrected timely. When monitoring is conducted for the next cycle, new findings are issued if necessary and the timeline starts over. Improvement activities have addressed these issues throughout the APR and additional activities for improvement are in the chart that follows. Program/provider-specific enforcement activities for ongoing noncompliance for all indicators included CAP's, technical assistance and monthly chart reviews by regional coordinators for agencies with noncompliance. Sanctions imposed following findings of noncompliance included recoupment of funds from and disenrollment of providers. In addition, a SPOE contract was not refunded and FSC agencies closed. Additional activities to address noncompliance are provided in the Indicators 1, 7, 8 sections:

# Report data on the correction of findings of noncompliance the State made during FFY 2007 (July 1, 2007 through June 30, 2008)

1.	Correction of FFY 2007 Findings of Noncompliance Timely Corrected (corrected within one year from identification of the noncompliance): Number of findings of noncompliance the State made during FFY 2007 (the period from July 1, 2007 through June 30, 2008) (Sum of Column a on the Indicator C 9 Worksheet)	40
2.	Number of findings the State verified as timely corrected (corrected within one year from the date of notification to the EIS programs of the finding) (Sum of Column b on the Indicator C 9 Worksheet)	33
3.	Number of findings not verified as corrected within one year [(1) minus (2)]	7

Correction of FFY 2007 Findings of Noncompliance Not Timely Corrected (corrected more than one year from identification of the noncompliance):

4.	Number of FFY 2007 findings not timely corrected (same as the number from (3) above)	7
5.	Number of findings the State has verified as corrected beyond the one-year timeline ("subsequent correction")	4 3
6.	Number of findings <u>not</u> yet verified as corrected [(4) minus (5)]	64

Louisiana has 6 remaining findings from FFY 2007 which have not been corrected. The Indicator 1, 7 and 8 sections describe the correction process, enforcement actions, and root cause analysis for findings. With the improved timeline for notification, correction and follow up, the State intends to achieve correction for the remaining 6 findings by June 30, 2010.

**Update April 1, 2010:** Louisiana has corrected the remaining finding from Indicator 7. The agency with the finding had been under corrective action. The CAP has now been completed and the noncompliance corrected according to OSEP's policy.

#### Correction of Remaining FFY 2006 Findings of Noncompliance (if applicable)

If the State reported <100% for this indicator in its FFY 2006 APR and did not report that the remaining FFY 2006 findings were subsequently corrected, provide the information below:

1.	Number of remaining FFY 2006 findings noted in OSEP's June 1, 2009 FFY 2007 APR response table for this indicator	12
2.	. Number of remaining FFY 2006 findings the State has verified as corrected	12
3.	Number of remaining FFY 2006 findings the State has NOT verified as corrected [(1) minus (2)]	0

All FFY 2006 findings have been corrected. The Indicator 1, 7 and 8 sections describe the correction process, enforcement actions, and root cause analysis for findings.

#### Correction of Any Remaining Findings of Noncompliance from FFY 2005

If the State reported <100% for this indicator in its FFY 2005 APR and did not report that the remaining FFY 2006 findings were subsequently corrected, provide the information below:

Number of remaining FFY 2005 findings noted in OSEP's June 1, 2009 FFY 2007 APR response table for this indicator	6
5. Number of remaining FFY 2005 findings the State has verified as corrected	6
6. Number of remaining FFY 2005 findings the State has NOT verified as correct [(1) minus (2)]	cted 0

All FFY 2005 findings have been corrected. The Indicator 1, 7 and 8 sections describe the correction process, enforcement actions, and root cause analysis for findings. As noted in the OSEP FFY 2007 SPP/APR Response Table, Louisiana was required to report on the correction of six findings identified in FFY 2005. Louisiana did not previously provide information on the correction of the remaining 2 findings identified in FFY 2005. One finding was for Indicator 2 and one finding was for Indicator 3. Both findings have been corrected and EarlySteps verifies that the agencies are implementing the requirements correctly and that the children subsequently received services appropriately.

#### Additional Information Required by the OSEP APR Response Table (if applicable)

Statement from the Response Table	State's Response
In reporting on correction of the remaining FFY 2005 and 2006 noncompliance, the State must report that it has: (1) corrected all instances of noncompliance (including noncompliance identified through the State's monitoring system, through the State's data system and by the Department); and (2) verified that each EIS program with identified noncompliance is correctly implementing the specific regulatory requirements, consistent with	EarlySteps identified faulty timeline processes which allowed for the ongoing noncompliance. Follow up activities verified performance, adherence to the regulatory requirements, and the status of each finding is reported in the appropriate indicator section above.
In responding to Indicators 1,7, 8a, and 8c, in the FFY 2008 APR the State must report on correction of the noncompliance described in this table under those indicators, the outstanding FFY 2005 findings under Indicators 1 and 7, and the outstanding FFY 2006 findings under Indicators 1,7,8a, and 8c.	In each Indicator section for 1, 7, 8a and 8c Louisiana has reported on correction for all findings for FY 2005 and 2006. Additional information also follows below.
In reporting on Indicator 9 in the FFY 2008 APR, the State must use the Indicator 9 worksheet.	Louisiana has submitted the Indicator C-9 worksheet above.
"The state must review its improvement activities and revise them, if appropriate to ensure they will enable the State to provide data in the FFY 2008 APRdemonstrating that the State timely corrected noncompliance identified by the State in FFY 2007"	Updated activities and revisions to improvement activities are submitted in the chart which follows.

#### **Indicator 1** Timely Services:

The Explanation of Progress and Slippage section for Indicator 1 outlines the EarlySteps *systems* problems that largely account for the ongoing findings for this indicator. These include the low reimbursement rates for providers and shortages of providers throughout the state. Improvement activities have been added to address these through out the system. For those agencies with ongoing findings of noncompliance these follow-up activities have been undertaken:

- Training by regional staff to affected programs regarding the definition of timely services, previously misunderstood
- Corrective Action Plans were developed and follow-up activities conducted by regional staff in 2007 and 2008
- Targeted technical assistance to individual agencies in identifying available services through other means than Part C service delivery options to reduce the length of time to access service providers

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- Periodic reporting to regional staff by affected agencies of caseloads to assure effective management of timelines
- Data review of IFSP's and billing for timeliness.
- The FFY 2005 and 2006 ongoing findings of noncompliance have been corrected. There
  was one uncorrected finding from 2007-2008. With intensive intervention provided by
  regional staff, EarlySteps anticipates correction by June, 2010.

#### **Indicator 7** IFSP completed within 45-day timeline:

The Explanation of Progress and Slippage section for Indicator 7 outlines the analysis for ongoing findings of noncompliance for this indicator. In addition, the following activities related to the remaining findings have been undertaken:

- Results of Self-Assessment by each SPOE agency reported to regional coordinator and central office each month for increased frequency of data review with comparisons of EIDS system data.
- Targeted technical assistance provided to SPOE agencies to identify and address problems in meeting timelines including frequent on-site assistance by the regional coordinator and staff changes within the SPOE agencies.
- Provided individual program performance as part of review of Request for Proposals when new contracts for services are awarded in July, 2008. As stated in a revised improvement strategy for this indicator, OCDD split the Region 1 agency into 2 SPOE agencies to continue to improve performance in this geographic area. The new contractors identified process problems in the previous contract agency that contributed to previous findings of noncompliance. Families were identified who had been referred, but for whom follow up was not timely. These families were contacted and solutions offered on a case-by-case basis to conduct eligibility determination and develop IFSP's. Those families whose children were approaching their third birthdays were assisted with transition to Part B. One family was offered compensatory services past the third birthday until the Part B evaluation was complete and IEP services started. The two, new agencies who were awarded contracts in regions 1 and 10 also have contracts in other regions which have a history higher performance in those regions.
- As reported in the October 1, 2009 status report to OSEP, the FFY 2005 and 2006 findings were corrected. The C-9 worksheet above shows one uncorrected finding from 2007-2008. The SPOE agency with the finding developed a CAP with the regional coordinator, has had follow up, and verification of implementation of the requirements for meeting the 45-day timelines has been made. All children, for whom IFSP's were not timely, subsequently received services, although late. The notification of correction has been sent.

#### Indicator 8a Transition Steps and Services

The Explanation of Progress and Slippage section for Indicator 8 outlines the analysis for ongoing findings of noncompliance for this indicator. In addition, the following activities related to the remaining findings have been undertaken:

- Targeted technical assistance provided to FSC agencies to identify and address problems in including transition steps and services on the IFSP. Regional coordinators meet will all new FSC's when hired to assure implementation of this requirement.
- Regional planning meetings that include FSC agencies as part of the Transition TA project.

#### Indicator 8c Transition Conference Held

The Explanation of Progress/Slippage section for Indicator 8 describes the reasons for noncompliance. In addition to the improvement activities listed the following activities were undertaken:

 Training to the FSC agencies and providers regarding compliance for this indicator by regional staff.

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- Corrective Action Plans developed and monthly follow up conducted by regional staff.
   Individual child charts were reviewed and follow up conducted with LEA's to verify successful transition for those children eligible for Part B.
- Follow up chart review to verify correction.

From 2007-2008, there were three ongoing findings of noncompliance for this indicator as reported in the Indicator 8 discussion section. The same three agencies had findings in 2008-09. The timelines established for corrective action and follow up will provide an increased opportunity for correction by June, 2010. These 3 agencies have had problems in other areas besides transition, including family and provider complaints. Central office and regional staff are involved in assisting them with addressing all concerns.

#### **Technical Assistance Resources Used:**

- Part C SPP/APR Indicator Analyses (FFY 2007-2008): used to develop strategies for improvement activities for correction of noncompliance
- September, 2008 FAQ Regarding Identification and Correction of Noncompliance and Reporting on Correction in the SPP/APR: used to clarify reporting timelines and requirements
- October 23, 2008 TA Call by Mid-South Regional Resource Center and State presentations and handouts from the OSEP,
- December 2008 Conference: used for considerations of systemic improvement at state level for the SERRC/DAC data quality TA project which began in January, 2009.
- SERRC/DAC TA project activities which have helped the State:
  - o correct procedures which were contributing to ongoing noncompliance
  - o formalize its calendar for focused and cyclical monitoring
  - identify additional activities to identify quality processes in the State's quality enhancement system.

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Indicator 9: Discussion of Improvement Activities Completed <u>and</u> Explanation of Slippage that occurred for FFY 2008-2009 and revisions, <u>with Justification</u>, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2008-2009

Improvement Activities-Indicator 9	Timelines	Discussion/Progress/Slippage	Revisions with Justification for 2009- 2010
Maintain an electronic system to track formal written complaints, due process hearings, mediations, etc.	Ongoing through 2011	The lead agency implemented a complaint tracking system to monitor the number of complaints received and resolved within the required timeframe. When a written complaint is received, the Quality Assurance Complaint Leader immediately enters the complaint in the complaint database. The complaint database contains the nature of the complaint, the date the complaint was received by EarlySteps' central office, date the complaint was closed, the name of provider that the complaint is filed against, the type of complaint, and the results of the investigation. A Complaint Status Report is compiled from the data stored in the database. This report is generated on a monthly basis and is distributed to the Program Manager and the Quality Assurance Specialists  See Revisions for Indicator 10 for changes to the complaint management process using the OCDD complaint process  OCDD continues to refine its online complaint database. The system is due to go live in 2010	
Beginning Spring, 2008 EarlySteps will participate in the development and implementation of OCDD's quality enhancement system for monitoring procedures.	Spring 2006 through 2011	OCDD finalized a provider quality enhancement guide for which training was provided state wide to SPOE and FSC agencies. This guide provides a structure for each agency to develop and implement their QA process.  All SPOE and FSC agencies are now submitting plans for approval by OCDD and subsequent implementation. In addition, EarlySteps is updating its QA Process Manual as part of the TA project with DAC and SERRC.	•

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Improvement Activities-Indicator 9	Timelines	Discussion/Progress/Slippage	Revisions with Justification for 2009- 2010
EarlySteps staff will participate in a Data Quality Project regarding its General Supervision system with DAC and SERRC beginning in January 2009. One anticipated outcome for the project is a highly structured process for continuous management of compliance findings		The TA project with DAC and SERRC began in January, 2009. The QA Coordinator was hired and came on board at the onset of the project. He is responsible for coordinating the project. In the first 6 months, a process to improve timely correction on noncompliance was identified. In addition, a calendar for all general supervision activities is complete.	
Conduct Desk Audits with SPOE data to identify potential non-compliance, conduct inquiry to obtain additional information as needed, issue findings of noncompliance if necessary, implementation of corrective action plans, provide of technical assistance, and assure correction of noncompliance in accordance with federal requirements.	Ongoing through 2011	SPOE agencies are required to run data reports on a regular basis to verify the accuracy of electronic data involving 618 data; IFSP 45-day timeline, primary settings, referrals, child count, transition, and exit reasons. If any of the data is found to be incorrect, corrections are made and new reports are generated from the corrected data. The data reports are instrumental in detecting potential areas of noncompliance. Based on the information in the data reports, responsive monitoring or technical assistance may be required to correct or prevent noncompliance.  In addition, SPOE agencies submit monthly self-assessments as part of their contract requirements.	Results of EIDS reports will be shared in each region which will yield comparisons of SPOE and system data. These reports will be managed by the QAS staff.
Identify potential non-compliance issues through data analysis, conduct inquiry to obtain additional information as needed, issue findings of noncompliance if necessary, implement corrective action plans, provide technical assistance, and assure correction of noncompliance in accordance with federal requirements.	Ongoing through 2011	As above	
Conduct on-site monitoring visits based on complaint inquiries reports, procedural safeguards complaints, and concerns identified through on-going review of system point of entry (SPOE) database.	Ongoing through 2011	If an agency receives technical assistance following a complaint or other concern and still does not improve, the Quality Assurance Specialist conducts an onsite or a responsive monitoring review. Based on the findings of the monitoring review a corrective action plan is developed to	

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Improvement Activities-Indicator 9	Timelines	Discussion/Progress/Slippage	Revisions with Justification for 2009- 2010
		address any areas of noncompliance. A calendar which identifies timelines for these activities in place for 2009-2010.	
Identify areas for additional professional development using data from monitoring reports and implement professional development activities as needed to ensure compliance.	Ongoing through 2011	Areas that need improvement are identified in the monitoring report. Corrective action plans and technical assistance provided by the Regional Coordinators are used as professional development tools to correct noncompliance	
FSC and SPOE agencies participate in training on new OCDD provider quality assurance project, develop processes to meet requirement and have them reviewed and approved by regional QAS staff.	January 2009- December 2010	OCDD developed and provided training on agency-specific quality standards. Agencies will submit their standards for review and approval.	
Participate in Data Quality TA project with SERRC and DAC coordinated by the QAS coordinator to identify, track, report, and resolve noncompliance as well as other Quality Assurance components of the early intervention system.	January 2009- December 2010	The project was initiated beginning in January, 2009. An initial meeting of central and regional office Coordinators and QAS, COS's, SICC Executive Director and committee chairs was held in February, 2009. A small workgroup has continued to meet to address the project workplan. The TA consultants have assisted the state in implementing its QA process calendar, correcting noncompliance, and preparing for the OSEP verification visit. Activities are ongoing in 2009-2010.	
Establish communication strategies for SPOE's and FSC agencies to highlight successes in meeting compliance indicators as assistance to those with ongoing noncompliance	January 2009 and ongoing	SPOE and FSC agencies have had occasional meetings with regional and central office staff as needed only. Ongoing activities will allow for a more frequent, regular meeting schedule to allow for implementation.	
New Activity for 2009-2010	July 2009- June 2010	As part of the Data Quality TA project and the OSEP verification visit, the State has identified the need to	

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Improvement Activities-Indicator 9	Timelines	Discussion/Progress/Slippage	Revisions with Justification for 2009- 2010
Develop consistent timeline and process for issuing determinations.		improve its process for issuing annual determinations. To date, the process has varied from year-to-year. With the availability of QA Coordinator and regional QA Specialists, the State is prepared to develop and implement a standard process on an ongoing basis.	

#### Overview of the Annual Performance Report Development - Indicator 10

- Process for monitoring of signed, written complaints developed by central office and quality assurance specialists
- Written, signed complaints tracked by central office for timeline compliance.

#### Monitoring Priority: Effective General Supervision Part C / General Supervision

**Indicator 10:** Percent of signed written complaints with reports issued that were resolved within 60-day timeline or a timeline extended for exceptional circumstances with respect to a particular complaint. (20 U.S.C. 1416(a)(3)(B) and 1442)

**Measurement:** Percent = [(1.1(b) + 1.1(c))] divided by 1.1] times 100.

FFY	Measurable and Rigorous Target
2008-2009	100% of signed, written complaints with reports issued will be resolved within 60-day timeline or a timeline extended for exceptional circumstances with respect to a particular complaint

#### Actual Target Data for FFY 2006-2007

100% of signed, written complaints with reports were resolved within 60-day timeline or a timeline extended for exceptional circumstances with respect to a particular complaint. Louisiana met its target of 100%.

	2004-2005	2005-2006	2006-2007	2007-2008	2008-2009
	Baseline				
Target	100%	100%	100%	100%	100%
Actual		69%	100%	100%	100%
Raw Data=		11 resolved	7 resolved	6 resolved	17 resolved
Complaints resolved		16 received	7 received	6 received	17received
Complaints received					

#### **Data Source and Measurement Considerations**

As indicated on Table 4 – 2009 Report of Dispute Resolution under Part C. The following is a summary of complaint activities:

- Louisiana received 18 written, signed complaints during FFY 2008.
- One complaint was dismissed or withdrawn
- 17 reports were issued within timelines, with findings.
- All complaints have been resolved according to required timelines.

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Discussion of Improvement Activities Completed <u>and</u> Explanation of Progress or Slippage that occurred for FFY 2008-2009

EarlySteps maintains procedures for receiving, investigating, and resolving complaints regarding alleged violations of Part C requirements. Procedures include complaint investigation, mediation and due process hearings. Families, providers, staff and other stakeholders may file a complaint. Complaints are reported at the regional level and notification provided to the central office staff for review. The complaint is then referred to the Quality Assurance Specialist for assignment and investigation. OCDD Policy and the EarlySteps Practice Manual outline the process by which complaints are made and subsequently handled.

Families are informed of their rights and receive procedural safeguards beginning at referral to the system, when written notice is provided and at the annual IFSP. Staff at the system points of entry, program staff, providers and families participate in training regarding parent rights provided through training modules and in technical assistance.

The majority of complaints received (9 out of 17) were the result of providers billing for services not provided, lack of service availability, or services not provided according to the IFSP. Families receive monthly Explanations of Benefits statements by which they can compare what has been billed with services their child received. This activity assists the State most frequently in identifying discrepancies in the provision of IFSP services. One complaint involved a family request to remove incorrect evaluation data from a child's file. Provider complaints involving discrepancies between service delivery and billing generally result in recoupment of funds. EarlySteps received a system-level complaint regarding lack of foreign language interpreters. The State acknowledged the problem and has increased the number of interpreters by 53%.

OCDD currently has a web-based complaint system now at the field-testing stage. This system will enhance access to complaint data to the designated staff for tracking, communication with families and complaint targets, looking for trends, and monitoring timely resolution. It will generate automatic email notices and timeline ticklers to staff responsible for handling. It also generates response letters to the complainant and resolution letters at completion. The new system should be in place statewide by June 30, 2010.

## February 1, 2010 Louisiana

#### Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for 2009-2010

Improvement Activities-Indicator 10	Timelines	Discussion/Progress/Slippage	Revisions with Justification for 2009- 2010
Review EarlySteps policies and procedures for processing complaints.	Ongoing through 2011	The policies and procedures for processing complaints are explained in the May 2006 EarlySteps Practice Manual and updated in the revised draft currently under review.  OCDD has revised its complaint policies and procedures to incorporate changes required with its new complaint data system, described below. The revisions will also be included in the revised EarlySteps Quality Assurance Manual.	
Incorporate the EarlySteps complaint process into the process used by OCDD. OCDD uses a uniform reporting and tracking system throughout its regional offices/human services districts/authorities effective, July, 2007.		A web-based complaint system is being field-tested and should be operational by 6/30/10.	The completion timeline for the revised complaint data base has been extended to June, 2010
Maintain a formal dispute resolution database to track requests for alternative dispute resolution.	Ongoing through 2011	The lead agency continues to use a complaint tracking system to monitor the number of complaints received and resolved within the required timeframe. When a written complaint is received, the Quality Assurance Specialist or regional Complaint staff immediately enters the complaint in the complaint database. The complaint database contains the nature of the complaint, the date the complaint was received by EarlySteps' central office, date the	

APR Template – Part C (4)	February 1, 2010 Louisiana		
	complaint was closed, the name of provider that the complaint is filed against, the type of complaint, and the results of the investigation. Additionally, the complaint database will be used to track requests for alternative dispute resolutions.		

#### Overview of the Annual Performance Report Development - Indicator 11:

Activities for the reporting for this indicator include:

- Implementation of complaint procedures by central office/regional staff
- Monitoring of complaints by central office (see indicator 10)

#### Monitoring Priority: Effective General Supervision Part C / General Supervision

**Indicator 11:** Percent of fully adjudicated due process hearing requests that were fully adjudicated within the applicable timeline.

(20 U.S.C. 1416(a)(3)(B) and 1442)

**Measurement:** Percent = [(3.2(a) + 3.2(b))] divided by 3.2] times 100.

FFY	Measurable and Rigorous Target
2008-2009	100% of fully adjudicated due process hearing requests were fully adjudicated within the applicable timeline.

#### Actual Target Data for FFY 2008-2009:

No due process hearings were requested in 2008-2009

## February 1, 2010 Louisiana

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for 2008-2009:

Improvement Activities-Indicator 11	Timelines	Discussion/Progress/Slippage	Revisions with Justification for 2009-2010
With the change in management of EarlySteps to OCDD, the complaint tracking and data system used by OCDD will be used for receiving, tracking and responding to complaints effective July 1, 2007	Ongoing through 2011	The lead agency currently uses a complaint tracking system to monitor the number of complaints received and resolved within the required timeframe. This database will also be used to track requests for dispute resolution.	Timelines for completion of the data base were extended to June 30, 2010
		The complaint process has been integrated into the OCDD system. A web-based application will be in place by June 30, 2010	
EarlySteps utilizes the OCDD Appeals Bureau to handle any due process hearing requests. These are referred to in the process as "Fair Hearings."	2006-2011	EarlySteps developed a training manual for the DHH Bureau of Appeals which would handle due process hearings, mediation requests, and/or appeals for EarlySteps. The manual provides copies of the relevant laws, policies, and OSEP policy letters to provide background information on the Part C system.	
Conduct periodic procedural safeguards trainings in each region for practitioners and families.	Ongoing through 2011	The Family Support Coordinators provide information to families on their rights. The State will develop a formal training that will be facilitated by the Community Outreach Specialists by 2011.	
Conduct recruitment of Hearing Officers to ensure adequate coverage for hearings requested.	Ongoing through 2011	EarlySteps would use the staff resources of the Bureau of Appeals for this purpose if requests were received.	

#### Overview of the Annual Performance Report Development-Indicator 12:

Not applicable—Louisiana has not adopted Part B due process procedures

Monitoring Priority: Effective General Supervision Part C / General Supervision

**Indicator 12:** Percent of hearing requests that went to resolution sessions that were resolved through resolution session settlement agreements (applicable if Part B due process procedures are adopted).

(20 U.S.C. 1416(a)(3)(B) and 1442)

**Measurement:** Percent = (3.1(a) divided by 3.1) times 100.

FFY	Measurable and Rigorous Target	
2008-2009	Not Applicable: Louisiana has not adopted Part B due process procedures.	

#### Actual Target Data for FFY 2008-2009:

Not applicable in Louisiana as Part B due process procedures have not been adopted.

Discussion of Improvement Activities Completed <u>and</u> Explanation of Progress or Slippage that occurred for FFY 2008-2009:

Not applicable

Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for 2009-2010.

Not applicable

#### Overview of the Annual Performance Report Development - Indicator 13:

Louisiana did not have any mediation requests in FFY 2008.

Monitoring Priority: Effective General Supervision Part C / General Supervision

Indicator 13: Percent of mediations held that resulted in mediation agreements.

(20 U.S.C. 1416(a)(3)(B) and 1442)

**Measurement:** Percent = [(2.1(a)(i) + 2.1(b)(i))] divided by 2.1] times 100.

FFY	Measurable and Rigorous Target
2008-2009	Based upon OSEP guidance, LA Part C has not set targets for Indicator 13 since the minimum threshold of 10 mediation requests has not been received.

#### **Actual Target Data for FFY 2008-2009**

Louisiana did not receive any mediation requests for 2008-2009.

Discussion of Improvement Activities Completed <u>and</u> Explanation of Progress or Slippage that occurred for 2008-2009

Not applicable

## February 1, 2010 Louisiana

Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for 2008-2009.

Improvement Activities- Indicator 13	Timelines	Discussion/Progress/Slippage	Revisions with Justification for 2009-2010
EarlySteps will utilize the OCDD Complaint data system to receive, respond to and track complaints and any requests for mediation as of July, 2007	Ongoing through 2011	The lead agency currently uses a complaint tracking system to monitor the number of complaints received and resolved within the required timeframe. This database will also be used to track requests for dispute resolution.  The dispute resolution process has been integrated into the OCDD process. The OCDD complaint data system is being field-tested and will go live by June 30, 2010	EarlySteps will utilize the OCDD Complaint data system to receive, respond to and track complaints and any requests for mediation as of July, 2007 and ongoing. Mediation activities would be conducted by the DHH Bureau of Appeals.
EarlySteps will utilize the OCDD appeals/hearing process for mediation requests as of July, 2007	2006-2011	The state did not receive any mediation requests in FFY 2008.	
		As above.	
Conduct periodic procedural safeguards trainings in each region for practitioners and families.	Ongoing through 2011	The Family Support Coordinators provide information to families on their rights. The State will develop a formal training that will be facilitated by the Community Outreach Specialists by 2011	
Conduct recruitment of Mediators to ensure adequate coverage for hearings requested.	Ongoing through 2011	The state has not received any mediation requests since FFY 2005, therefore recruitment of Mediators was not needed.	EarlySteps would use the resources of the Bureau of Appeals to handle mediation. Training materials have been developed regarding Part C and its requirements for use for this activity.

#### Overview of the Annual Performance Report Development - Indicator 14:

Louisiana reviewed federal data reporting requirements and the FFY 2007 APR Response Table for timely submission of data

Data system reviews and onsite monitoring were used to assess accuracy of data reported.

#### Monitoring Priority: Effective General Supervision Part C / General Supervision

Indicator 14: State reported data (618 and State Performance Plan and Annual Performance Report) are timely and accurate.

(20 U.S.C. 1416(a)(3)(B) and 1442)

**Measurement:** State reported data, including 618 data, State performance plan, and annual performance reports, are:

- a. Submitted on or before due dates (February 1 for child count, including race and ethnicity, settings and November 1 for exiting, personnel, dispute resolution); and
- b. Accurate (describe mechanisms for ensuring error free, consistent, valid and reliable data and evidence that these standards are met).

FFY	Measurable and Rigorous Target
2008-2009	100% of state-reported 618, state performance plan and annual performance report data are timely and accurate

#### **Data Source and Measurement Considerations:**

Timely submission of OSEP data reports and use of the Indicator C-14 Data Rubric

#### **Actual Target Data for FFY 2008:**

Louisiana did not meet its target for Indicator 14 and experienced regression.

	2004-2005 Baseline	2005-2006	2006-2007	2007-2008	2008-2009
Target	100%	100%	100%	100%	100%
Actual	Data submitted late with extensions due to Gulf Coast Hurricanes	50%	97.8% (state report) 93.3% (OSEP calculation)	97% (state report) 93.1% (OSEP calculation	88.9% (state report) 86.4% rubric calculation

SPP/APR Data - Indicator 14					
APR Indicator	Valid and Reliable	Correct Calculation	Total		
1	1	1	2		
2	1	1	2		
3	1	1	2		
4	1	1	2		
5	1	1	2		
6	1	1	2		
7	1	1	2		
8a	1	1	2		
8b	1	1	2		
8c	1	1	2		
9	1	1	2		
10	1	1	2		
11	1	1	2		
12	0	0	0		
13	1	1	2		
		Subtotal	28		
APR Score Calculation	Timely Submission Points - If the FFY 2008 APR was submitted on-time, place the number 5 in the cell on the right.  Grand Total - (Sum of subtotal and Timely Submission Points) =		5		
			33		

618 Data - Indicator 14					
Table	Timely	Complete Data	Passed Edit Check	Responded to Data Note Requests	Total
Table 1 - Child Count Due Date: 2/1/09	1	1	0	1	3
Table 2 - Program Settings Due Date: 2/1/09	1	1	0	1	3
Table 3 - Exiting Due Date: 11/1/09	1	1	0	N/A	2

### February 1, 2010 Louisiana

Table 4 - Dispute Resolution Due Date: 11/1/09	1	1	1	N/A	3
				Subtotal	11
618 Score Calculati	on		<b>Grand Total</b> (Subtotal X 2.5) =		27.5

Indicator #14 Calculation				
A. APR Grand Total	33.00			
B. 618 Grand Total	27.50			
C. APR Grand Total (A) + 618 Grand Total				
(B) =	60.50			
Total NA in APR	0.00			
Total NA in 618	0.00			
Base	70.00			
D. Subtotal (C divided by Base*) =	0.864			
E. Indicator Score (Subtotal D x 100) =	86.4			

# Discussion of Improvement Activities Completed <u>and</u> Explanation of Progress or Slippage that occurred for FFY 2008-2009.

Lousiana had slippage for this indicator from 2007-2008. The State used the self-calculating rubric as seen above. Since the data for Indicator 12 does not apply to Louisiana, the total is subtracted from the grand total (Total=33 instead of 35). However, the calculation is based on the base score of 70, when it should be 68. The actual target should be 88.9 by the State's calculation. Submitted data tables were submitted on time but did not pass edit checks. The self-calculating data table worksheets require use of "-9" instead of "0" for data that does not apply. When the tables were submitted, Louisiana used "0."

# Revisions, <u>with Justification</u>, to Proposed Targets/Improvement Activities/Timelines/Resources for 2009-2010

Improvement Activities – Indicator 14	Timelines	Discussion/Progress/Slippage
Conduct periodic data runs of SPOE database to identify and as needed correct missing and/or questionable data.	Summer 2005 ongoing through 2010	SPOE agencies are required to run data reports on a regular basis to verify the accuracy of electronic data involving 618 data; IFSP 45-day timeline, primary settings, referrals, child count, transition, and exit reasons. If any of the data is found to be incorrect, corrections are made and new reports are generated from the corrected data. The data reports are instrumental in detecting potential areas of noncompliance. Based on the information in the data reports, responsive monitoring or technical assistance may be required to correct or prevent noncompliance.
EarlySteps will work with the DHH Information Technology		Since IT data resources of OCDD have increased, accessing reports and data

Improvement Activities – Indicator 14	Timelines	Discussion/Progress/Slippage
department to coordinate data functions across the Covansys (CFO) system and other internal data systems.		has improved.
Continue enhancements of SPOE Database as described throughout the SPP.	Summer 2005 ongoing through 2010	Enhancements such as IFSP 45 day delay reasons to capture family reasons for delay and the date of the transition conference was added to the EIDS system to assist with reporting.
Hire full time Data Manager	Spring 2007 and ongoing	OCDD hired a staff person in its Quality Unit who assists EarlySteps with accessing information beyond standard reports, from the data system.
The organizational structure for the EarlySteps program has resulted in positions of a Quality Assurance Specialist Coordinator (under the Children's Services Program Manager) and a central office Quality Assurance Specialist who will assume some of the functions of a data manager in conjunction with staff from DHH-Information Technology and Health Economics staff. Regional quality assurance specialists for assistance in local/regional programs.		In February, 2009, OCDD hired a Quality Assurance Coordinator to supervise the General Supervision/Quality Assurance Process for EarlySteps. In addition, a Data Analyst was hired for the OCDD system and will assist performing functions of the EarlySteps Data Manager.